

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 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 personal information. For the purposes of this Policy, personal information shall mean any information relating to an identifiable natural person. This Policy applies only to information we collect, process, and use through the Platforms.

Purpose of Data Collection

We collect personal data of our customers for account management, billing, internal marketing (not third-part marketing), fraud prevention purposes and provision of our Internet security services. Information we collect includes customer name, email address, IP address, billing information and phone number. We may share such data with third parties who provide us with billing, marketing, account management tools, and other product support that enable us to provide services to our customers.

Information You Give Us

When you actively provide us with personal information, we collect that information for processing and use in accordance with this Policy. The following are current examples of when you provide such information:

- Signing up on our web page to be contacted about career opportunities,
- Signing up on our web page to be contacted generally by a company representative,
- Subscribing to our news and updates;
- Providing your resume for employment consideration; and
- If you are an existing employee, providing information to Human Resources for employment and business purposes.

How We Use Information

We collect and use personal information as described in this Policy only as much as it is necessary to render the services you have requested or, regarding the personal information of employees, as far as may be reasonably necessary to fulfill Magellan’s business purposes. These services and business purposes include the following:

- Contacting you per your request about career opportunities;
- Contacting you per your request about general inquiries;
- 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.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right

to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How We Share Information

We only disclose your personal information to third parties as follows:

- We may share personal information with Magellan Aviation Group LLLP's parent company, Marubeni Corporation as they request it for internal business purposes;
- We use affiliated and unaffiliated service providers including web servers, cloud storage systems, and email services, to help us deliver our services and run our business subject to strict confidentiality agreements. These companies are authorized to use your personal information only as necessary to provide these services to us.
- We will disclose data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, or if we believe in good faith such disclosure is necessary to comply with relevant laws or to respond to subpoenas, warrants, legal process served on us.
- We will otherwise share personal information only with your consent.

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 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 EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union and the United Kingdom. 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 Data Privacy Framework (DPF) Program, and to view

our certification, please visit <https://www.dataprivacy.framework.gov>.

With respect to personal data received pursuant to the EU U.S. 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-U.S. DPF complaints concerning data transferred from the EU.

Data Access

Data Subjects whose Personal Data is covered by this EU-U.S. 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-U.S. 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

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

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-U.S. DPF Annex I Arbitration Mechanism certain residual claims to arbitration to determine whether a EU-U.S. DPF organization violated its obligations to you.
- It is possible, under certain conditions, that you make 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 futures Magellan does transfer personal information to a third party, Magellan remains liable under the EU-U.S DPF Principles of the third-party processes such personal information in a manner inconsistent with EU-U.S. DPF Principles. Magellan remains liable unless it can prove that it is not responsible for the event giving rise to the damage.

Updates to Our Privacy Policy

We may periodically revise this Policy by posting an updated version on our website at 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.