

## **Magellan Aviation Group LLLP Privacy Policy**

**Updated 11 June 2020**

This updated Privacy Policy (the “Policy”) becomes effective on November 30, 2018 for all users, provided that the enhanced data protection rights in this Policy required by the EU General Data Protection Regulation (the “GDPR”) become effective on March 25, 2018 for all EU-resident users who are natural persons.

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.

### **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, as described in greater detail below.

### 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. Privacy Shield Participation

Magellan complies with the EU-U.S. Privacy Shield Framework (the "Privacy Shield") as set forth by the U.S. Department of Commerce subjecting all personal information transferred from EU member countries to the United States to its applicable principles. We have certified such adherence to the Privacy Shield Principles to the Department of Commerce. If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, visit the U.S. Department of Commerce's Privacy Shield at <https://www.privacyshield.gov/>.

We are responsible for the processing of personal data we receive under the Privacy Shield, and we acknowledge such liability as prescribed in the GDPR for non-compliant distribution and use of personal information.

With respect to personal data received pursuant to the Privacy Shield, we are subject to the investigatory and enforcement powers of the U.S. Feder 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.

In compliance with the Privacy Shield Principles, Magellan commits to resolve complaints about our collection or use of your personal information. If you have any inquires or complaints regarding our Privacy Policy please first contact us at:

[www.magellangroup.ethicspoint.com](http://www.magellangroup.ethicspoint.com)

OR

1-844-231-3567

Magellan has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) regarding unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

#### 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:

[Amanda.Dunn@magellangroup.net](mailto:Amanda.Dunn@magellangroup.net)

[Catherine.McHale@magellangroup.net](mailto:Catherine.McHale@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 Privacy Shield Annex I Arbitration Mechanism certain residual claims to arbitration to determine whether a privacy shield organization violated its obligations to you.

#### Updates to Our Privacy 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.