

## CALIFORNIA PRIVACY NOTICE ADDENDUM

This California Privacy Notice Addendum ("**California Notice**") supplements the [Privacy Notice](#) and applies solely to visitors, **users**, and others who reside in the State of California ("**consumers**" or "**you**"). Jet Aviation Holdings, Inc. and its affiliates ("**Jet Aviation**," "**we**," "**us**," "**our**") adopted this California Notice to comply with California privacy laws, including the California Consumer Privacy Act ("**CCPA**"). Any terms defined in the CCPA and not defined here have the same meaning when used in this California Notice.

### 1. COLLECTION AND USE OF PERSONAL DATA

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be **linked**, directly or indirectly, with a particular consumer or household ("**personal data**"). In addition, we may collect data that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

#### Use of Personal Data

We collect and process your personal data for our business purposes, which include the following:

1. Providing you with information tailored to your requests, responding to inquiries, and delivering services and products;
2. Operating, maintaining, and improving the quality of the Services and such content, products, and/or services as we may make available through the Services;
3. Communicating with you by email, mail, telephone, push notification, and other methods of communication, in each case with your consent, if such consent is required in accordance with applicable laws, about products, services, order status, and other topics;
4. Compliance with applicable laws, regulations, rules, and requests of relevant law enforcement and/or other governmental agencies;
5. Endeavoring to protect our and our partners' rights, property, or safety, and the rights, property, and safety of our users and other third parties;
6. For marketing purposes, including sending messages to you about us, our partners, and the products and services we and our partners offer, which may from time to time include contests, rewards, events, and special offers for products and services; and processing personal data collected through social media platforms and web tracking technologies to market to and understand our audience; and
7. For other purposes, as permitted or required by law.

We will not use the personal data we collected for material different, unrelated, or incompatible purposes without providing you with notice and obtaining your consent.

## Sharing of Personal Data

We share personal data with the following categories of third parties:

- **Affiliated Entities.** We share personal data among our affiliated entities;
- **Service Providers.** We share personal data with our service providers, including those that provide aircraft support services such as maintenance and scheduling, payment processors, software and Web developers, customer relations management (CRM) services, communications services, order processing and fulfillment services, commercial mail/email providers, security consultants, data hosting services, and other vendors we engage so that they may provide services to you, to us, or on our behalf; and
- **Third Parties.** We share personal data with third parties when you ask us to do so; or when we believe it is required by, or necessary to comply with, applicable law.

## Processing of Personal Data

Within the last twelve (12) months, we have collected, used, and shared the following categories of personal data:

1. Identifiers;
2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e));
3. Characteristics of protected classifications under California or federal law;
4. Commercial information;
5. Internet or other electronic network activity information;
6. Geolocation data;
7. Audio, electronic, visual, thermal, olfactory, or similar information; and
8. Professional or employment-related information.

## 2. YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83, known as the "Shine the Light" law, permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to [privacyinfo@jetaviation.com](mailto:privacyinfo@jetaviation.com), and are free of charge.

We do not disclose personal data protected under the "Shine the Light" law to third parties for their own direct marketing purposes.

The CCPA provides California residents with the following rights:

1. **Right to Know:** You have the right to request that we disclose certain information to you about the personal data we collected, used and disclosed about you in the past 12 months. This includes a request to know any or all of the following:
  - The categories of personal data collected about you;
  - The categories of sources from which we collected your personal data;

- The categories of personal data that we have sold or disclosed about you for a business purpose;
  - The categories of third parties to whom your personal data was disclosed for a business purpose;
  - Our business or commercial purpose for collecting or selling your personal data; and
  - The specific pieces of personal data we have collected about you.
2. **Data Portability:** You have the right to request a copy of personal data we hold about you.
3. **Right to Deletion:** You have the right to request that we delete the personal data we collected from you and maintained, subject to certain exceptions. Please note that if you request deletion of your personal data, we may deny your request or may retain certain elements of your personal data if it is necessary for us or our service providers to:
- Complete the transaction for which the personal data was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between our business and you.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
  - Debug to identify and repair errors that impair existing intended functionality.
  - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
  - Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
  - To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
  - Comply with a legal obligation.
  - Otherwise use the personal data, internally, in a lawful manner that is compatible with the context in which you provided the information.
4. **Right to Opt-In to Financial Incentives:** You have the right to opt-in to financial incentive programs. You also have the right to opt-out at any time. However, we currently do not offer financial incentive programs.
5. **Right to Opt-Out/In:** You have the right to opt-out of the sale of your personal data. You also have the right to opt-in to the sale of personal data. However, we do not and will not sell your personal data.

6. **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment by us for the exercise of your CCPA privacy rights. Unless permitted by the CCPA, we will not:
- Deny you goods or services.
  - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
  - Provide you a different level or quality of goods or services.
  - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Some of our Services, however, may require your personal data. If you choose not to provide your personal data, you may not be able to use those Services. In addition, as described in the section captioned "YOUR CHOICES," of the [Privacy Notice](#), it is possible to change your browser settings to block the automatic collection of certain information.

### 3. SUBMITTING A VERIFIED CONSUMER REQUEST

To exercise your Right to Know, Data Portability, and Right to Delete, you must provide us with sufficient information to allow us to verify your identity, and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Once we receive the information you provide to us, we will review it and determine if more information is necessary to verify your identity as required by law, and we may request additional information in order to do so.

To exercise your California privacy rights described above, please submit a verifiable request to us by:

- Emailing us at [privacyinfo@jetaviation.com](mailto:privacyinfo@jetaviation.com)

Only you, or a person authorized by you to act on your behalf, may make a verifiable consumer request related to your personal data.

You may only make a verifiable consumer request for Right to Know or Data Portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative. Given the sensitivity of your personal data that we collect and retain, we will need to verify your identity with at least two pieces of information, such as your name (first and last) and address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- We may deny your request if we are unable to verify your identity or have reason to believe that the request is fraudulent.

## Consumer Request by an Authorized Agent

If any authorized agent submits a consumer request on your behalf, in order to confirm that person or entity's authority to act on your behalf and verify the authorized agent's identity, we require a call be made to the toll-free number provided above, or an email be sent to [privacyinfo@jetaviation.com](mailto:privacyinfo@jetaviation.com), along with all of the below items:

- To verify your authorization to request on behalf of a California resident, provide one or more of the following: (1) California Secretary of State authorization, (2) written permission from the California resident, or (3) power of attorney.
- To verify your identity, provide: (1) evidence of your identity, and (2) your name (first and last) and address.
- To verify the identity of the California resident for whom the request is being made, provide the consumer's name (first and last) and address.

We may request additional information to verify your identity and/or authority to make the request. We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. We will only use personal data provided in a verifiable consumer request to verify the request's identity or authority to make the request.

We will acknowledge receipt of the request within ten (10) days of its receipt. We will respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## 4. SALE OF PERSONAL DATA

We never sell your personal data to third parties for money. However, the CCPA defines "sale" broadly, and that definition could include information that we have shared with our service providers. In the past twelve (12) months, we have "sold" (as defined under the CCPA) the following categories of personal data set forth in the list under Section 1 "Processing of Personal Data": 1, 2, 4, 5, and 6. We disclosed this personal data to our service providers to allow them to provide services to you, to us, or on our behalf.

We do not and will not knowingly sell the personal data of minors under the age of 16 without affirmative authorization.

Do Not Track: We use analytics systems and providers that process personal data about your online activities over time and across third-party websites or online services and these systems and providers may provide some of this information to us. We do not currently process or comply with any web browser's "Do Not Track" signal or similar mechanisms.

Note, however, that you may find information about how to opt out of Google Analytics and/or block or reject certain tracking technologies in our [Cookies Notice](#).

## **5. MODIFICATIONS AND UPDATES TO THIS CALIFORNIA NOTICE**

This California Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this California Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised California Notice. We will use reasonable efforts to notify you in the event material changes are made to our processing activities and/or this California Notice, such as by posting a notice on the applicable Services for a period of time or sending you an email. Your continued use of the Services following our posting of any revised California Notice will constitute your acknowledgement of the amended California Notice.

## **6. ADDITIONAL INFORMATION AND ASSISTANCE**

If you have any questions or concerns about this California Notice and/or how we process personal data, please contact us at:

[privacyinfo@jetaviation.com](mailto:privacyinfo@jetaviation.com)