

1.1 PURPOSE

Hevilift Group is committed to protecting the privacy of Personal Information we may collect or obtain in the course of business from individuals inside or outside the organisation. This Global Privacy Statement (“Privacy Statement”) describes the type of Personal Information Hevilift Group may collect, how we may use and share that information, and how you can correct or change such information.

1.2 SCOPE

This Privacy Statement describes the ways Hevilift Group manages Personal Information it receives: (i) in the course of its operations involving the transportation of passengers, search and rescue, medevac, and other purposes (collectively, “Passengers”); (ii) from visitors of Hevilift Group offices, websites, social media, or events; (iii) from prospective employees in connection with employment applications; and (iv) in the course of interactions with its current, prospective, and former suppliers, vendors, subcontractors, and business partners (collectively, “Suppliers”). All individuals and entities that Process Personal Information on behalf of Hevilift Group are expected to protect Personal Information in adherence to this Privacy Statement.

2.1 PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

The types of Personal Information we may collect (directly from you or Third Parties) depend on the nature of the relationship that you have with Hevilift Group and the requirements of applicable law. We collect only information relevant for the purposes of Processing. We do not engage in automated decision making when Processing your Personal Information. Below are the legal bases for Processing Personal Information, some of the ways we collect information and how we use it.

Passengers

Information Hevilift Group collects from, or on behalf of its Passengers includes name, business or company affiliation, and body weight. The information is used for flight planning purposes and to generate manifests that are used by Hevilift Group personnel to satisfy civil aviation regulatory requirements and to safely and efficiently operate our aircraft.

Information Hevilift Group collects from Passengers and other persons involved in search and rescue, medevac, or other related purposes may include name, date of birth, gender, other biographical data, and health information. The information may be used to provide medical care to such Passengers and other persons, including in life and death situations, and for purposes of passing onto Third Parties as further described below. Hevilift Group may also store and Process health information for purposes of improving the quality of care of future Passengers and other persons. In such cases, personal identifiers such as name are redacted from the records.

Suppliers

The information Hevilift Group collects from its Suppliers relates to the management of these relationships and the exchange of requested services and products. Such information may include title, name, address, phone number, email address, invoicing and other payment information, and

agreements executed with Hevilift Group.

We Process Personal Information about Suppliers for a variety of business purposes, including but not limited to:

- Generally managing Supplier information;
- Responding to questions and requests;
- Verifying Supplier identity;
- Communicating about Supplier accounts and activities;
- Processing payments for products or services purchased by Hevilift Group;
- Developing new services, products, and processes; and
- Further purposes disclosed at the time Suppliers provide Personal Information, or otherwise with the consent of the Supplier.

Visitors

If you visit a Hevilift Group office, we may collect Personal Information about you, including but not limited to: your title, name, address, phone number, email address, business or company affiliation, government identification (driver's license, passport), and other details you provide. We Process this information for a variety of purposes, including: to verify your identity, to provide access to Hevilift Group facilities and systems, for security and other safety purposes, to communicate with you regarding your visit, to provide information we believe may be of interest to you, including: regarding Hevilift Group's services, and for purposes disclosed at the time you provide Personal Information, or otherwise with your consent.

Recruiting

If you submit Personal Information via the Careers section of our website, LinkedIn, or otherwise inquire about or apply for a position at Hevilift Group, we will Process such Personal Information solely for the purposes of considering applications and recruitment (and for purposes of our administration or management if you commence work for Hevilift Group).

Online Requests

Hevilift Group may collect Personal Information that you provide through its website for purposes of requesting commercial inquiries. We collect only Personal Information that you provide to us and only for purposes of fulfilling your request for information. Hevilift Group does not sell or otherwise provide your Personal Information to Third Parties.

Social Media Activities

Hevilift Group may collect Personal Information to enable Data Subjects to use online social media resources, which may include posting or sharing Personal Information with others.

When using these resources, you should consider what Personal Information you share with

others.

Information from Third-Party Sources

Hevilift Group may collect information about you from Third Party sources to supplement information provided by you. This supplemental information allows us to verify or supplement information that you have provided to Hevilift Group and to enhance our ability to provide you with information about our business and services. Hevilift Group's agreements with these Third Parties typically limit how Hevilift Group may use this supplemental information.

2.2 ONWARD TRANSFER

Information We Share

Hevilift Group does not sell or otherwise disclose Personal Information about you, except as described elsewhere in this Privacy Statement or as you explicitly consent. Hevilift Group may share Personal Information with our service providers and consultants for our internal business purposes or to provide you with a service that you have requested; or in the case of search and rescue, to other Third Parties including medical health providers, coroners, police, and other emergency service providers. Hevilift Group requires our service providers to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf, including: to provide at least the same level of protection as required by the Privacy Shield Principles and GDPR not to use it for any purpose other than the purpose for which Hevilift Group retained them, and to notify Hevilift Group if they make a determination that they can no longer comply with that obligation.

We may disclose information about you: (i) if we are required to do so by law, court order, or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation or arbitration; (iv) to enforce Hevilift Group policies, contracts, or other rights; (v) to collect amounts owed to Hevilift Group; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation or prosecution of suspected or actual illegal activity; (vii) if in good faith we believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes—e.g., to detect unauthorised activity on the Hevilift Group website. In such cases, server log data containing IP addresses may be shared with law enforcement bodies, contractors, or consultants so that they may identify users in connection with their investigation of the unauthorised activities.

We reserve the right to disclose or transfer any information we have about you in the event of: a proposed or actual reorganisation, sale, lease, merger, joint venture, assignment, amalgamation, or any other type of acquisition, disposal, or financing of all or any portion of Hevilift Group or of any of our assets (including should Hevilift Group cease to trade, become insolvent, or enter into receivership or any similar event occur). Should such an event take place, we will endeavor to direct the transferee to use Personal Information in a manner that is consistent with this Privacy Statement.

Data Transfers

Your Personal Information may be transferred to other Hevilift Group offices, data centers, and servers in countries of the Asia-Pacific Region for the purposes identified. Any such transfer of

Personal Information shall take place only in accordance with applicable law. Hevilift Group will take steps designed to comply with all applicable local laws when Processing Personal Information, including any local law conditions for and restrictions on the transfer of Personal Information. Hevilift Group may also protect your data through other legally valid methods, including international data transfer agreements.

2.3 INDIVIDUAL RIGHTS OF ACCESS AND CHOICE

Subject to applicable law, you may have the right to obtain confirmation regarding whether Hevilift Group Processes Personal Information about you, request access to and receive information about the Personal Information we maintain about you, receive copies of the Personal Information we maintain about you, update and correct inaccuracies in your Personal Information, object to the Processing of your Personal Information, and have the information blocked, anonymised, or deleted, as appropriate. The right to access Personal Information may be limited in some circumstances by local law. To exercise these rights, please contact us at dataprivacy@hevilift.com.

Where otherwise permitted by applicable law, you may use any of the methods set out in this Privacy Statement to request access to, receive (port), or restrict Processing, seek rectification, or request erasure of Personal Information held about you by Hevilift Group. Such requests will be processed in line with applicable laws. Although Hevilift Group makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which Hevilift Group is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the information is commercially proprietary. If Hevilift Group determines that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Hevilift Group will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

2.4 RETENTION

Hevilift Group retains Personal Information that we receive for as long as necessary to fulfill the purpose(s) for which the information was collected, to provide our services and products and to resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with all applicable laws.

2.5 SECURITY

The security of all Personal Information provided to Hevilift Group is important to us and we take reasonable steps to protect your Personal Information. Hevilift Group maintains administrative, technical and physical safeguards to protect Personal Information. Even though Hevilift Group has implemented designed methods to ensure the protection of your personal information, we cannot guarantee that such information will not be lost, used unlawfully or modified in a fraudulent manner since no data transmission over the Internet can be guaranteed to be completely confidential. Consequently, we bear no liability for the use that may be made of the information by you or any third party.

2.6 OTHER RIGHTS AND IMPORTANT INFORMATION

Changes to this Privacy Statement

Hevilift Group may update this Privacy Statement from time to time as it deems necessary or appropriate in its sole discretion. Hevilift Group encourages you to review this Privacy Statement periodically to be informed regarding how Hevilift Group is using and protecting your information and to be aware of any policy changes. Any changes to this Privacy Statement take effect immediately after being posted or otherwise provided by Hevilift Group.

2.7 CONTACT US

If you have any questions or comments regarding this Privacy Statement or Hevilift Group privacy practices, or if you would like us to update the information you provided to us, you may contact us at dataprivacy@hevilift.com.

Effective date: November 01, 2018