

Alto Aerospace Ltd - Privacy Policy

We respect your right to privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please read this Privacy Policy carefully.

1. About Us

1.1

In this Privacy Policy, references to “we”, “us” or “Alto” are to Alto Aerospace Ltd, a company incorporated in England and Wales (registered number 10916899) whose registered office is at Aerial Court, Bournemouth Airport, Christchurch, Dorset, BH23 6NE who will be the controller of any personal data processed as described in this Privacy Policy.

1.2

If you have any questions about your personal information, please click contact us using the details on our website, or email us directly at operations@altoaero.com.

2. Use of the Website

This Privacy Policy applies only to your use of the Website.

3. Collection of Information

3.1

When you access the Website via any means, register or post notes, respond to or participate in any survey or questionnaire sent to you by us, provide comments, or make a purchase through the Website, we may collect, store and use certain of your personal information in line with this policy. We may also ask you for information when you report a problem with the Website.

3.2

To register or make a purchase on the Website, we ask for your name and email address. As part of your profile you may also provide your location and other information that will help us to tailor the service to suit you. We may also ask you about your gender and employment history or qualifications in order to understand more about you (responding to these questions will always be optional, however). When you make a purchase, our payment service provider, will also collect and process your credit card or other payment details. If you contact us, we may also keep a record of that correspondence.

3.3

We may also collect data relating to your visits to the Website that cannot identify you but records your use of our Website, for example, details of how long you have used the Website for.

3.4

We may also collect your computer's IP address in order to help us tailor the service to your location.

3.5

If you elect to verify your identity through our Website, our identity verification partner will receive directly from you, process and store your personal information and identity documentation for this purpose. Our identity verification partner may store your information for a maximum of 5 days for the sole purpose of resolving user support issues. Upon successful verification of your identity, we will store only the name given on your identification documentation.

3.6

Finally, we may receive information about you from third parties (such as credit reference agencies) who are legally entitled to disclose that information.

4. Use of Your Information

4.1

By accessing the Website via any means, registering or posting notes, providing comments, or making a purchase via the Website, you agree that your personal information may be collected, stored, used and shared by us and our partners or third parties we work with, for any of the following purposes:

- To provide, maintain, protect and improve the quality of the Website, inc by conducting anonymised market research, and to protect us and our users;
- To provide you with a personalised browsing experience when using the Website;
- To fulfil any contractual agreements between you and us;
- To send you details of our other products and services which we think may interest you, unless you opt out as described at paragraph 9.1.3 below. You can control your email preferences on the settings page accessed through any email which we have sent you;
- To tailor our advertising on social media to your use of the Website;

- To allow you to use the full range of features on or via our Website;
- To comply with legal and regulatory requirements;
- To contact you occasionally in order to invite you to share your opinions and experiences of Alto; and in order to provide third party goods or services available through our Website.

4.2

We may use your email address to send you updates about our Services. You can control your email preferences on the settings page accessed through any email which we have sent you.

5. Storage of Information

5.1

All information is stored on our secure servers. When you register, we will provide a password which enables you to access our Members content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.

5.2

In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the European Economic Area, which may have lower standards of data protection. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, please be aware that we cannot guarantee the security of information transmitted over the Internet.

6. Legal Basis for Processing Your Information

6.1

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

6.2

However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not

overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

6.3

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).

6.4

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

7. Disclosure of Your Information

We may disclose your personal information to third parties when permitted by law including:

a. With your consent;

b. to our suppliers in order for them to help us provide our services to you, this includes:

- Our provider of customer relationship management services (which allows us, for example, to send personalised email communications to you);
- Our provider of file storage and management services if you email us directly;
- Our payment services provider (as discussed at paragraph 3.2 above) when you make a purchase to process your payment;
- Our identity verification partner (as discussed at paragraph 3.5 above) to verify your identity where you choose to select this option; and
- Our customer service software if you contact our support team.

These suppliers' use of your personal data may be subject to their own privacy policies, which are available on their websites, and which we suggest you familiarise yourself with in the relevant circumstances set out above.

c. if we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets, provided

that they continue to use your information substantially in accordance with the terms of this Privacy Policy;

d. if all, or substantially all of our assets, are acquired by a third party provided that they continue to use your information substantially in accordance with the terms of this Privacy Policy, in which case information held by us will be one of the transferred assets; and

e. if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply any other agreements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8. Data Retention

8.1

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

8.2

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. Your Rights

You have the following data protection rights:

- You can edit your personal details via your profile page whenever you wish. We maintain a procedure in order to help you confirm that your personal information remains correct and up-to-date or choose whether or not you wish to receive material from us or some of our partners.
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under Section 13 “Contacting Alto”.

- You may unsubscribe from certain email communications by following the Unsubscribe link in the email communication itself. You may also update your personal information by logging into the Website and visiting your account page. You may also email us at operations@altoaero.com in order to access, correct, delete or update your personal information on our systems. We will answer every email as promptly as possible.
- Similarly, if we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- If you have any privacy-related questions or unresolved problems, you may contact us using the information provided at paragraph 13 below.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)
- The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Please check these policies before you submit any personal information to these websites.

10. Children

We strongly believe in protecting the privacy of children. In line with this belief, we do not knowingly collect or maintain personal information from persons under 13 years of age, and no part of the Website is directed to persons under 13 years of age. If you are under 13 years of age, then please do not use or access the Website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 13 years of age.

11. Cookies

The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website may no longer be available to you.

12. Updating this Privacy Policy

We may update or amend this Privacy Policy from time to time, to comply with law or to meet our changing business requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access the Website your access and use will be subject to these updates and amendments.

13. Contacting Alto

If you have any questions, comments or complaints about this Privacy Policy, please contact us using the details below:

Alto Aerospace Ltd
FAO: Data Protection Officer
Aerial Court
Bournemouth Airport
Christchurch
Dorset
BH23 6NE
United Kingdom

E-mail: operations@altoaero.com

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