

LEGAL DOCUMENTATION: PRIVACY & COOKIE POLICY

Entity: Aethera Aviation Sp. z o.o.

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I. PRIVACY POLICY

1. INTRODUCTION

At **Aethera Aviation Sp. z o.o.**, data protection is a primary concern. This policy ensures you are informed about how we process personal data collected through our website, during the provision of our aviation services, or via direct communication. We process all data in a transparent manner, ensuring security and compliance with European standards.

2. LEGAL BASES FOR PROCESSING

Our data processing activities are governed by:

- The GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council.
- Polish Law:** The Act of 10 May 2018 on the Protection of Personal Data.
- Telecommunications Law:** Regarding the use of cookies and electronic communication.

3. DATA COLLECTION & CATEGORIES

We collect information that is voluntarily provided by you or necessary for the execution of our services. This includes:

Category	Specific Data Points
Identity Data	Name, surname, age, sex, and professional status.
Contact Data	Email address, phone number, residential or postal address.
Corporate Data	Company name, NIP/VAT number, headquarters address, your job function.

Aviation Data	Passport/ID details (for passenger manifests), flight preferences, and dietary requirements.
Technical Data	IP address, browser type, and navigation history on our site.

4. PURPOSES OF PROCESSING

We process your data for the following reasons:

- **Service Delivery:** To manage flight bookings, ground handling, and aviation consulting.
- **Communication:** To respond to inquiries and provide technical or commercial support.
- **Legal Compliance:** To fulfill aviation safety regulations, border control requirements, and tax obligations.
- **Security:** To protect our website and services from unauthorized access or cyber threats.

5. DATA PROTECTION & SECURITY MEASURES

We maintain high-level organizational and technical security measures to prevent data from being altered, lost, or accessed by unauthorized third parties.

Important Security Reminder: While we implement rigorous safeguards, no internet transmission is 100% secure. We encourage you to protect your own data by using strong passwords and logging out of shared devices.

6. YOUR RIGHTS (GDPR)

As a data subject, you have the following rights:

- **Access & Rectification:** Request a copy of your data or correct inaccuracies.
- **Erasure:** Request the deletion of your data (where legal retention periods allow).
- **Restriction & Objection:** Limit how we process your data or object to its use for marketing.
- **Portability:** Receive your data in a machine-readable format.
- **Withdrawal of Consent:** You may withdraw consent at any time without affecting the legality of processing based on consent before its withdrawal.

To exercise these rights, please contact us at contact@aethera-aviation.com.

II. COOKIE POLICY

1. DEFINITION

Cookies are small text files stored on your device that help us recognize you and remember your preferences.

2. TYPES OF COOKIES USED

1. **Strictly Necessary:** Essential for the website to function (e.g., security and navigation).
2. **Analytical/Performance:** Used to understand how visitors interact with the site (e.g., Google Analytics).
3. **Functional:** Remember your choices (e.g., language settings).
4. **Targeting:** Used to deliver relevant advertisements and track marketing effectiveness.

3. CONTROLLING COOKIES

You can manage your cookie preferences through our website's consent banner or via your browser settings.

- **Refusing Cookies:** You may choose to reject non-essential cookies. Please note that disabling cookies may limit the functionality of certain parts of our website.

III. DATA RETENTION & TRANSFERS

1. RETENTION PERIOD

We store data only for as long as necessary:

- **Contractual Data:** For the duration of the contract and the subsequent statute of limitations for claims.
- **Accounting/Tax Data:** For 5 years from the end of the tax year, as per Polish law.
- **Marketing Data:** Until you withdraw your consent.

2. INTERNATIONAL TRANSFERS

In the aviation industry, your data (such as passenger manifests) may be shared with airport authorities, handling agents, or border control outside the EEA. We ensure these transfers are conducted using standard contractual clauses or other legal safeguards approved by the European Commission.

IV. SUPERVISORY AUTHORITY

If you believe your data is being processed unlawfully, you have the right to lodge a complaint with: **Prezes Urzędu Ochrony Danych Osobowych (UODO)** ul. Stawki 2, 00-193 Warsaw, Poland www.uodo.gov.pl