EDAERO Privacy Policy

Applicable to www.eadaero.com and crews.eadaero.com

Version 2.0 | Effective Date: 1 October 2026

1. Scope

This Privacy Policy explains how **EDAERO LLC** (“EDAERO”, “we”, “us” or “our”) collects, uses, discloses, stores and otherwise processes personal data through **www.eadaero.com**, **crews.eadaero.com** and related EDAERO Services.

This Policy should be read together with the Terms & Conditions, Cookie Policy and AI & Automated Decision-Making Notice.

2. Our Data-Protection Roles

EDAERO may act as an **independent controller** for processing where EDAERO determines the purposes and essential means, including account administration, professional verification, MissionReady™, Reliability Standing, fraud prevention, sanctions compliance, Platform security, payments administration, tax reporting and service analytics.

EDAERO may act as a **processor** for defined Operator-controlled processing where an Operator determines the purposes and means and instructs EDAERO to process data on its behalf, for example certain Private Crew Cloud or Operator-uploaded data. Such processing is governed by the Data Processing Addendum.

An Operator may also act as an independent controller of Professional or passenger information it receives or uploads. Users remain responsible for having a lawful basis to provide personal data to EDAERO.

3. Categories of Personal Data

Depending on how you use EDAERO, we may process:

- identity and contact data, such as name, email, phone, nationality or account details;
- professional profile data, such as role, employment or professional history, aircraft types, experience, hours, training and languages;
- credential data, such as licences, ratings, certificates, recurrent checks and expiry dates;
- minimum necessary medical-status information, such as medical class/status and validity or expiry, where relevant;
- visa, work-authorization and travel-readiness information;
- home base, location and availability information;
- Mission information, including requested role, aircraft, reporting time, dates, routing and commercial terms;
- payment, payout and tax information processed through authorized payment providers;
- verification information and review records;
- Reliability Standing information, including Recorded Events and Reported Events;

- ratings, reviews and support communications;
- device, browser, IP address, security, login and Platform activity logs;
- fraud, sanctions and security signals;
- cookie, analytics and consent-preference information.

4. Special-Category and Sensitive Data

Medical information may constitute special-category or sensitive personal data under applicable law. EDAERO applies data minimisation and ordinarily seeks only the minimum information reasonably necessary for the relevant Platform purpose, such as medical class/status and validity or expiry.

EDAERO does not ordinarily require diagnosis, treatment history or unrelated medical records. Where additional health information is lawfully necessary, EDAERO will identify an appropriate legal basis or special-category condition and apply heightened safeguards.

Users should not upload unnecessary medical, passenger or other sensitive information.

5. Purposes and Legal Bases

We process personal data for the purposes below using the legal basis or legal justification applicable in the relevant jurisdiction.

Purpose	Typical data	Typical legal basis / justification
Create and manage accounts	identity, contact, login data	performance of contract; legitimate interests
Professional profiles and Mission matching	profile, experience, availability, credentials	performance of contract; legitimate interests
Verification and document-status tracking	credentials, expiry, identity	performance of contract; legitimate interests; legal obligation where applicable
MissionReady™ and compliance-support	credentials, Mission requirements, flags	legitimate interests; performance of contract; safeguards for automated processing
Reliability Standing	Platform events, reported events, review records	legitimate interests; contract; legal rights and claims where applicable
Mission administration	Mission details, communications	performance of contract
Payments and payouts	payment, payout, identity, KYC	performance of contract; legal obligation; legitimate interests
Tax reporting	tax identifiers, payout data	legal obligation
Fraud, sanctions and security	identity, transaction, device, aircraft or account signals	legal obligation; legitimate interests
Support and dispute handling	communications, records	performance of contract; legitimate interests; legal claims
Service analytics and improvement	usage, device, analytics data	legitimate interests or consent where required

Marketing	contact and preference data	consent where required; legitimate interests where permitted

We do not rely on a statement that “use of EDAERO means consent to all processing.” Consent is used only where appropriate and may be withdrawn where applicable.

6. AI and Automated Processing

EDAERO may use AI-assisted or automated tools for document extraction, expiry detection, discrepancy detection, matching, ranking, MissionReady™, fraud indicators and Reliability administration.

AI is used as decision support. EDAERO does not use AI alone to make final regulatory, medical, FTL, airworthiness, safety-of-flight or crew-assignment determinations.

Where applicable law grants rights concerning significant automated decisions, EDAERO provides safeguards such as meaningful human review, an opportunity to provide information and the ability to challenge materially inaccurate data. Further information appears in the AI & Automated Decision-Making Notice.

7. Sources of Personal Data

We collect data:

- directly from you;
- from an Operator or Professional involved in a Mission;
- from authorized organization administrators;
- from payment, identity or verification providers;
- from public or regulatory sources where lawfully used;
- from Platform activity and technical systems;
- from other Users who submit Reported Events, ratings or reviews.

Reported information is not automatically treated as independently verified.

8. How We Share Personal Data

We may share personal data with:

- Operators and Professionals as reasonably necessary for matching, Mission evaluation, confirmation and administration;
- Stripe or other authorized payment providers;
- identity, verification, communications, hosting, security and analytics providers acting under appropriate contractual terms;
- professional advisers, insurers, auditors or financing counterparties where lawfully necessary;
- competent authorities where disclosure is required by law;
- a successor entity in a merger, corporate conversion, financing, sale or reorganization, subject to applicable law.

EDAERO does not sell personal data in the ordinary meaning of selling data for money. If applicable U.S. state privacy law treats certain advertising or analytics disclosures as “sale” or “sharing,” EDAERO will provide required opt-out mechanisms.

9. Operator and Passenger Data

Operators must provide only data they are lawfully permitted to share. Passenger or VIP personal information should be uploaded only where reasonably necessary for the Mission and lawful.

EDAERO encourages need-to-know handling of passenger identities, preferences, itineraries and other aviation-sensitive information.

10. International Transfers

EDAERO is a U.S.-based business and may process personal data in the United States and other countries where service providers or Users are located.

Where international-transfer restrictions apply, EDAERO uses lawful mechanisms as appropriate, which may include adequacy decisions, the European Commission Standard Contractual Clauses, the UK International Data Transfer Agreement or UK Addendum, or another legally recognized safeguard.

Where required by applicable law, EDAERO will complete transfer-risk assessments and implement supplementary safeguards appropriate to the risk.

11. EU and UK Representatives

Where EDAERO is legally required to appoint a representative under Article 27 GDPR, UK GDPR or equivalent law, EDAERO will appoint that representative and publish current contact details in the legal section of **www.eadaero.com** before relying on the relevant cross-border offering that requires such appointment.

12. Retention

EDAERO retains personal data only for as long as reasonably necessary for the purposes for which it was collected, including account administration, Mission records, payment and tax obligations, dispute handling, fraud prevention, sanctions compliance, regulatory obligations and legal claims.

Retention periods vary by data type and legal requirement. EDAERO maintains an internal retention schedule and may retain data longer where necessary because of legal hold, investigation, dispute, fraud or mandatory recordkeeping.

Expired or superseded documents are not retained indefinitely merely because they were once uploaded. Medical-status data is subject to enhanced minimisation and retention controls.

13. Security

EDAERO uses technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration or disclosure. Measures may include access controls, encryption where appropriate, authentication controls, logging, role-based permissions, backups, vendor controls and incident-response procedures.

No system can be guaranteed completely secure. Users are responsible for protecting account credentials and reporting suspected compromise promptly.

14. Security Incidents

EDAERO maintains procedures to assess and respond to personal-data breaches. Where law requires notification to a supervisory authority or affected individual, EDAERO will make the required notification within the applicable legal timeframe.

15. Your Privacy Rights

Depending on where you live, you may have rights to:

- request access to personal data;
- request correction of inaccurate data;
- request deletion where legally available;
- request restriction of processing;
- receive portable data where applicable;
- object to certain processing;
- withdraw consent where processing is based on consent;
- challenge or seek human review of certain significant automated decisions;
- opt out of certain targeted advertising, sale or sharing under applicable U.S. state law;
- lodge a complaint with a competent data-protection authority.

Rights are subject to applicable exceptions and identity verification. Requests may be submitted through the privacy/contact channel published on **www.eadaero.com** or the privacy controls available in the Platform.

16. Accuracy and Reported Events

Users should keep their personal and professional information accurate and current. If EDAERO receives a Reported Event from another User that may create a material adverse Platform consequence, the affected User will ordinarily have an opportunity to respond and request correction before final adverse treatment, subject to urgent fraud, sanctions, security or legal exceptions.

17. Children

EDAERO Professional and Operator accounts are intended for adults and are not directed to children. EDAERO does not knowingly offer Professional accounts to persons under 18.

18. Communications and Marketing

EDAERO may send operational communications necessary to administer accounts, Missions, security, payments and legal notices. Where required by law, marketing consent is obtained separately and may be withdrawn using the applicable opt-out mechanism.

19. Cookies and Similar Technologies

EDAERO uses cookies and similar technologies as described in the Cookie Policy. Where law requires prior consent for non-essential cookies, EDAERO will use a consent mechanism that allows Users to accept, reject or manage such technologies.

20. Changes to This Policy

EDAERO may update this Privacy Policy to reflect legal, regulatory, technical or business changes. Material changes will be notified in a manner appropriate to the change and applicable law. The effective date at the top of the published Policy will identify the current version.

21. Contact

Privacy requests, complaints and questions may be submitted using the privacy or legal contact details published on **www.eadaero.com**. Where a statutory representative or data-protection contact is legally required, current details will be published in the same legal section.