

GUARDIAN AIR ASSET MANAGEMENT PTY LTD

PRIVACY NOTICE

Introduction:

This Notice explains how we obtain, use, and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

Guardian Air Asset Management Pty Ltd including this website www.guardianair.co.za; and guardianair.co are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

Who we are:

Guardian Air is a trusted Air charter, Medevac and Aviation Management company, providing a suite of specialised services to meet the discerning needs of business travellers, tourists and adventurers in Africa. From our base at Lanseria International Airport in Gauteng, South Africa, we offer comprehensive aircraft management and maintenance solutions to aircraft owners and organizations, as well as air ambulance services to two trusted, private emergency medical care companies.

What is personal information:

Personal Information according to the Protection of Personal Information Act, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b. Information relating to the education or the medical, financial, criminal or employment history of the person;
- c. Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views or preferences of the person;
- f. Correspondence sent by the person that would reveal the contents of the original correspondence.

The type of personal information we collect:

- The types of Personal Data that we may collect includes information necessary for our legitimate business interests. This may include personal information which contains identifiable information such as (amongst other things) your first and last name, email address, postal address, physical address, telephone number, date of birth.

- We collect, the following information, including, but not limited to:
 - a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person.
 - b) information relating to the education or the medical, financial, criminal or employment history of the person.
 - c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person.
 - d) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
 - e) the views or opinions of another individual about the person; and
 - f) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- We collect and process your personal information mainly to contact you for the purposes of understanding your requirements and delivering services accordingly.
- We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.
- Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

How we get the personal information:

- Information you provide to us:
 - (b) Directly from you.
 - (c) Based on your use of our services
 - (d) Based on how you engage or interact with us, such as social media, and through e-mails, letters, telephone calls.
 - (e) Use of our Website
 - (f) From third parties affiliated with our services
 - (g) From Entities within our group.

- Collection of Information by “Cookies”:

You are aware that information and data is automatically collected through the standard operation of the Internet servers and through the use of "cookies." "Cookies" are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the Website and allow a website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our websites.

When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child **consents** to the processing. Kindly note that you have the right to withdraw your consent.
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party.
- The processing complies with an **obligation** imposed by law on the business.
- The processing protects a **legitimate** interest of the data subject.
- The processing is necessary for the proper performance of a **public law** duty by the business
- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

We may disclose your personal information to our service providers who are involved in the services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes.
- Where we believe it is necessary to protect our rights

How we store your personal information:

- Guardian Air Asset Management (Pty) Ltd will secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable, technical, and organisational measures to prevent –
 - a) Loss of, damage to or unauthorised destruction of personal information; and
 - b) Unlawful access to or processing of personal information.

- Guardian Air Asset Management (Pty) Ltd will take responsible measures to –
 - a) Identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control.
 - b) Establish and maintain appropriate safeguards against the risks identified.
 - c) Regularly verify that the safeguards are effectively implemented; and
 - d) Ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

International Transfer of Personal Information

In some cases, the third parties to whom we may disclose your personal information may be located outside your country of residence (for example, in a cloud service, system or server), and may be subject to different privacy regimes.

When we disclose personal information overseas, we will take appropriate safeguards to protect your personal information to ensure that the recipient will handle the information in a manner consistent with this policy and the level of protection provided for in POPIA.

Your data protection rights:

- You are entitled to access your personal data by sending a written request to: Nadia.dicks@guardianair.co.za. We may charge you a fee for this service as set out in terms of Condition 8 of POPIA.
- You may also request Guardian Air Asset Management Pty Ltd to correct or supplement any of your personal data which Guardian Air Asset Management Pty Ltd will undertake as soon as practicable.
- Request the destruction of your personal data via the Information Officer: Nadia Dicks – Nadia.dicks@guardianair.co.za or Deputy Information Officers, Arno Van Zanten – arno.vanzanten@guardianair.co.za or Verity Daniels – Verity.Daniels@guardianair.co.za who will consider your request in light of any other laws or regulations prohibiting Guardian Air Asset Management Pty Ltd from destroying your personal data.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at: Nadia.dicks@guardianair.co.za if you wish to make a request.

Contact details:

Name: NADIA DICKS
Address: GATE 5, HANGAR 7, LANSERIA INTERNATIONAL AIRPORT, 1748
Phone Number: 011 701 3011
E-mail: Nadia.dicks@guardianair.co.za

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at: Nadia.dicks@guardianair.co.za.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

Their contact details are as follows:

The Information Regulator (South Africa)

33 Hoofd Street
Forum III, 3rd Floor Braampark
P.O Box 31533
Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za