

PRIVACY POLICY

Introduction

This privacy policy is designed to inform users of the CloudAhoy, Inc. website and mobile application, which provide flights analysis and debrief service (the “Service”) about how CloudAhoy, Inc. (“CloudAhoy”, “we” or “us”) gathers and uses personal information collected by CloudAhoy through the Service. CloudAhoy will take reasonable steps to protect user privacy consistent with the guidelines set forth in this policy and with applicable U.S. laws. In this policy, “user” or “you” means any person viewing the CloudAhoy website, using the Service or submitting any personal information to CloudAhoy in connection with using the Service. By using the Service, you are indicating your consent to this Privacy Policy. **IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU SHOULD NOT USE THE SERVICE.**

What Information Do We Collect?

Personal Information: If you sign up to create a CloudAhoy account we ask you for certain personal information for the account, including information such as your name, email address, payment information (such as credit card number), home airport and ratings (the “Personal Information”). In addition, if you contact CloudAhoy and disclose additional personal information, we may store that Personal Information.

User Data: When you use the Service, you may transmit to CloudAhoy certain user-specific data (“User Data”) including the flight data (for example, location data including GPS coordinates, flight planning information, flight parameters, and audio), and additional information that the Service allows you to input, such as annotations and comments to your flight data, and auxiliary information such as pilot names.

Web Tracking Information: We, and third party service providers that we engage to provide services to us (“Contractors”), may use web tracking technologies such as cookies, web beacons, pixel tags and clear GIFs in order to operate the Service efficiently and to collect data related to usage of the Service. Such collected data (“Web Tracking Information”) may include the address of the websites you visited before and after you visited the CloudAhoy website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Service you visit and what links you clicked on, and whether you opened email communications we send to you. In order to collect Web Tracking Information and to make your use of the Service more efficient, we may store cookies on your computer. We may also use web tracking technologies that are placed in web pages on the Service or in email communications to collect information about actions that users take when they interact with the Service or such email communications, and our Contractors may also do so. Some Web Tracking Information may include data, such as IP address data, that is unique to you. You may be able to modify your browser settings to alter which web tracking technologies are permitted when you use the Service, but this may affect the performance of the Service.

Mobile Users: If you access the Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application, your geographic location data including GPS coordinates, or similar information regarding the location of your mobile device.

How Do We Use the Information We Collect?

Personal Information: We will use and store Personal Information for the purpose of delivering the Service (including to establish or renew your CloudAhoy account), and to analyze and enhance the operation of the Service. We may also use Personal Information for the internal operational and administrative purposes of the Service. We may enter Personal Information into our contact management database, and may use such database to send you marketing materials and to contact you regarding your interest in CloudAhoy products and services.

User Data: We will use the User Data only to provide the Service. We may aggregate User Data across all or a subset of users to create statistical information relating to the use of the Service, as described in “Aggregate Information” below.

Aggregate Information: We will also create statistical, aggregated data relating to our users and the Service for analytical purposes. Aggregated data is derived from Personal Information and User Data but in its aggregated form it does not relate to or identify any individual or any specific flight data. This data is used to understand our customer base and to develop, improve and market our services.

Web Tracking Information: We use Web Tracking Information to administer the Service and to understand how well our Service is working, to store your user preferences, and to develop statistical information on usage of the Services. This allows us to determine which features visitors like best to help us improve our Service, to personalize your user experience, and to measure overall effectiveness.

Legal Exception: Notwithstanding the above, CloudAhoy may use Personal Information to the extent required by law or legal process, or if in CloudAhoy’s reasonable discretion use is necessary to investigate fraud or any threat to the safety of any individual, to protect CloudAhoy’s legal rights or to protect the rights of third parties.

What Information Do We Disclose to Third Parties?

CloudAhoy’s Disclosure of Personal Information: CloudAhoy will not disclose Personal Information to any third party except as described in this section.

We may disclose Personal Information to our Contractors who are bound by written obligations of confidentiality. Our Contractors help us develop software, perform statistical analysis, send you email or postal mail, and provide customer support, or arrange for deliveries. Our Contractors are prohibited from using your personal information except to provide these services to CloudAhoy.

User Data, individual account: We do not disclose User Data to any other users. However, if you enable “flight sharing”, you can choose to share User Data for certain flights with other users of the Service, with individuals who are not users of the Service, or on social media, or to publish a link to your User Data online. We cannot guarantee or be responsible for the protection of User Data shared through “flight sharing”.

User Data, organization account: If you access and use the Service as an end user authorized by

an organization which is a CloudAhoy customer, we will not disclose your User Data to any other users; provided, depending on the privacy settings for the Service selected by your organization, we may share some or all of your User Data and your Personal Information with designated individuals who are members of your organization's CloudAhoy account. Your organization may allow certain individuals to access some or all of your flight data, User Data, or Personal Information associated with your account, and administrators may be able to modify User Data, to share it with others within or outside your organization, to archive it, and to delete it. You can contact your organization's administrator(s) for information about your organization's policy regarding access to your account and to its data. Depending on the settings imposed on the Service by your organization, you may also be able to explicitly enable "flight sharing" so as to allow sharing of User Data for certain flights outside of your organization, and if you do so, we cannot guarantee or be responsible for the protection of User Data.

Permitted Third Parties: You may also permit specific third party entities to access part or all your User Data, from an individual or organization account, in order to provide you services based on that User Data. For example, you may authorize an insurance provider to access your User Data to determine whether you qualify for policy discounts. CloudAhoy will not disclose your User Data to any such third-party entity without your express consent to share your User Data with that specific third-party entity, and you may revoke that access at any time by using a form on our Services or by contacting us at team@cloudahoy.com. Once your User Data has been shared with a permitted third party, your User Data is subject to the privacy and security policies of that entity, and CloudAhoy cannot guarantee and is not responsible for the use or protection of User Data by that third party.

Web Tracking Information: We disclose Web Tracking Information to Contractors, in order to analyze the performance of the Service and the behavior of users, and to operate and improve the Service. Certain Web Tracking information, such as the popularity ranking of certain pages of the Service, may be published on the Service and so disclosed to all users of the Service.

Aggregate Information: We may disclose aggregated data that does not contain Personal Information to any third parties, such as potential customers, business partners, advertisers, and funding sources, in order to describe our business and operations.

Successors and Law Enforcement: Notwithstanding the foregoing, CloudAhoy reserves the right to disclose any information CloudAhoy collects in connection with the Service, without further notice to you (a) to any successor to CloudAhoy's business as a result of any merger, acquisition or similar transaction; and (b) to any law enforcement or regulatory authority to the extent required by law or if, in CloudAhoy's reasonable discretion, disclosure is necessary to investigate fraud or any threat to the safety of any individual, to protect CloudAhoy's legal rights or to protect the rights of third parties.

Consent: CloudAhoy may disclose your Personal Information with your consent.

How Can You Opt Out of Use and Disclosure of Your Information?

If you wish to be removed from our mailing list, please contact us at team@cloudahoy.com. In the event of any such removal, CloudAhoy may retain copies of information for its archives. If you wish to opt out of promotional emails, you may do so by following the “unsubscribe” instructions in the email, or by editing your account settings, or by sending a request to team@CloudAhoy.com. All users receive administrative emails, and so you cannot opt out of them while you remain registered.

Access and Updating of Information

You can update your Personal Information by using the profile editing tools on the Service. CloudAhoy will respond to any reasonable request by a user to review or amend his or her Personal Information held in our mailing list or database. CloudAhoy reserves the right to verify your identity in order to provide such access. Please contact us by sending an email to team@CloudAhoy.com.

Security: We use reasonable security precautions to protect the security and integrity of your Personal Information and User Data in accordance with this policy and applicable law. CloudAhoy secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information is transmitted through the Service, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

However, no Internet transmission is completely secure, and we cannot guarantee that security breaches will not occur. Without limitation of the foregoing, we are not responsible for the actions of hackers and other unauthorized third parties that breach our firewalls, secure server software, and other reasonable security procedures. **BY USING OUR SERVICE, YOUR ACKNOWLEDGE THAT YOU UNDERSTAND AND AGREE TO ASSUME THIS RISK.**

Links: The Service may contain links to other websites. CloudAhoy is not responsible for the privacy practices or the content of those websites. Users should be aware of this when they leave our site and review the privacy statements of each Web site they visit that collects information. This Privacy Policy applies solely to personal information collected by CloudAhoy.

Amendments: CloudAhoy may modify or amend this policy from time to time. If we make any material changes, as determined by CloudAhoy, in the way in which Personal Information or User Data is collected, used or transferred, we will notify you of these changes by modification of this Privacy Policy, which will be available for review by you at the Service.

Service Visitors from outside the United States: CloudAhoy and its servers are located in the United States and are subject to the applicable state and federal laws of the United States. If you choose to access the Service, you consent to the use and disclosure of information in accordance with this privacy policy and subject to such laws.

Terms of Use: This policy forms part of, and is subject to, the provisions of CloudAhoy’s Terms of Use.

[California Online Privacy Protection Act Notice](#)

On September 27, 2013, California enacted A.B. 370, amending the California Online Privacy Protection Act to require website operators like us to disclose how we respond to "Do Not Track Signals"; and whether third parties collect personally identifiable information about users when they visit us.

(1) We do not track users who do not interact with our sharing functionality across the web, and therefore do not use "do not track" signals.

(2) We do not authorize the collection of personally identifiable information from our users for third party use through advertising technologies without separate member consent.

California Civil Code Section 1798.83 also permits our users who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to team@CloudAhoy.com. Please note that we are only required to respond to one request per user each year.

Children: CloudAhoy does not knowingly collect or maintain personally identifiable information from persons under 13 years of age, and no part of the Service is directed at persons under 18. If you are under 18 years of age, then please do not use the Service. If CloudAhoy learns that personal information of persons less than 13 years of age has been collected without verifiable parental consent, then CloudAhoy will take the appropriate steps to delete this information. To make such a request, please contact us at team@CloudAhoy.com.

Contact Information

CloudAhoy welcomes your comments regarding this Privacy Policy. If you believe that CloudAhoy has not adhered to this Privacy Policy, please contact us at team@CloudAhoy.com. We will use commercially reasonable efforts to promptly investigate and remedy the problem.

- [CloudAhoy]
- [Address]
- (781) 269-1138

team@CloudAhoy.com

Effective Date of this policy: April 28 2019

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