



## General Statement of Privacy

Professional Flight Management, Inc. and PFM Hosting, Inc. (collectively referred to herein as PFM) respect the privacy of their clients and of those who visit PFM-operated and managed websites.

This Privacy Policy applies to business visitors and clients visiting the websites provided and maintained by PFM, including:

- www.pfmsys.com – the “commercial website”
- demonstration websites established for potential clients to try the applications and services provided by PFM
- websites set up to support specific industry events
- client websites maintained under contract.

PFM complies with the EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries, the United Kingdom (including Gibraltar), and Switzerland to the United States. PFM has certified to the Department of Commerce that it adheres to the Data Privacy Framework (DPF) Principles. If there is any conflict between the policies in this privacy policy and the DPF Principles, the DPF Principles shall govern. To learn more about the DPF program and to view our certification page, please visit <https://www.dataprivacyframework.gov/>.

PFM is subject to the investigatory and enforcement powers of the US Federal Trade Commission.

## Information We Collect and Store

When you visit one of the PFM websites mentioned above, our Web server automatically recognizes your computer's domain name or Web-enabled device. We may also collect information on what pages users access or visit, as described below. We may collect information from surveys where we are looking to gather information on specific topics. This information will be gathered anonymously unless the survey specifically states that user-provided information may be used for directed marketing or development purposes. Each survey includes the intended use of the information that is gathered.

We do not collect or process the following information:

- Race or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union memberships
- Pay rates or pay scales
- Genetic or biometric data
- Health or mortality
- Sex life or sexual orientation

We provide databases and data structures hosted on PFM hardware which are used by our clients to maintain the information required for managing and reporting of their flight operations. Our clients collect information on passengers and crew required to support flight operations including government regulatory requirements – this may include full legal name, home address, telephone number(s), email address(es), citizenship, date, and place of birth, and passport information. Some of this data may be exported to third-party vendors or government agencies by, or under the direction of, our clients according to their contractual requirements. PFM does not collect, data-mine or use any of this information for its own purposes – it is stored to assist with the operation and management of PFM client flight operations by the client. We do not gather any personal data for automated decisions.

### **Privacy of Children**

Our websites are not directed at or intended for use by, children under the age of 18. While we don't typically know the age of our data subjects, we do not knowingly allow anyone under 18 to provide any Personally Identifiable Information (PII) to us. If you believe your child may have provided us with PII, you can contact our Privacy Officer using the information in the Choices About Data Collection and Use section of this privacy notice and we will undertake all reasonable efforts to delete the data.

### **Use of Information by PFM and Others**

We do not examine or use any client information entered into databases or tables except as may be allowed or required under contract to support client operations. PFM may use information collected about visitors to our commercial and demonstration websites to:

- fulfill purchases and other requests made by visitors;
- improve the content of our websites;
- customize the content and/or layout of Web pages for individual visitors;
- contact members and those who visit our public sites about new products and services or upcoming events;
- notify visitors about updates to our websites;
- contact visitors for marketing purposes;
- disclose information, when legally required to do so, at the request of governmental authorities conducting an investigation; in response to a lawful request by public authorities, including to meet national security or law enforcement requirements;
- verify or enforce compliance with the policies governing our websites and applicable laws or protect against misuse or unauthorized use of our websites.

PFM does not share information collected through our websites with external agents or contractors, nor do we rent or sell email addresses to third-party organizations. We may share information with a client regarding access to any of its designated websites maintained by PFM.

## **Use of Cookies and Browser-Level Information**

A "cookie" is a small piece of information that a website can store in a designated file on your computer or Web-enabled device. Cookies can be used, among other things, to identify your computer or device when you log into a website and may track your IP address to do so.

When you visit our websites, we may use cookies to collect aggregate information on the number of visitors to our site and the number of pages viewed. We may also use cookies for security purposes. While PFM analyzes website logs to monitor traffic flow and make improvements to the site's content, content within the website logs is not personally identifiable, and no attempt is made to link such content to individual visitors to this site unless the cookies are used for security purposes. This information is used only by PFM and is not shared with third-party companies.

If you register through one of our websites, we may place a unique identifier cookie to maintain your "sign on" status for the duration of your visit to the site, customize or tailor your visit, and store your user preferences for that site over time. We also use cookies to track the pages visited to deliver PFM Web content based on a visitor's profile (as provided by the visitor) and the visitor's past activity. These cookies also enable our sites to customize the Web page content based on a visitor's browser type or other information that the visitor sends.

## **Liability in Cases of Onwards Transfer**

PFM may enable the transfer of personal information for limited and specified purposes at the direction of a client. If PFM is initiating any transfer, it takes reasonable steps to ensure any onward processing and handling is in accordance with the client agreement and PFM's security and privacy principles. Suppose it is found that these obligations are not followed. In that case, PFM will immediately cease forwarding the information and, in concert with the client, take appropriate steps to remediate unauthorized processing. PFM retains responsibility for any unauthorized forwarding personal information from its facilities to an unauthorized third party. Additionally, upon request from the Department Of Commerce, PFM will summarize all relevant contract provisions with clients and agents.

## **Choices About Data Collection and Use**

We may allow third-party organizations to place advertisements on our public websites. Those organizations may collect web-reporting data on their placed advertisements.

If you do not wish to receive information about new PFM products and services or upcoming events, you may opt out of receiving promotional communications by sending an email request to [pfm@pfmsys.com](mailto:pfm@pfmsys.com). In your email, please indicate which mode(s) of communication you would like to opt out of (postal mail, email, and/or telephone contact).

Visitors can also choose not to accept cookies. Your Web browser should alert and permit you to refuse cookies. Please check with the company operating your browser for more information on how to change those browser-level settings. Please note that disabling cookies for some services may affect your ability to use those services.

For data collected directly by PFM, we will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit your request to the point of contact detailed in the Access and Correction section below. If you do not wish your personal data held within a PFM client database, you must contact the client directly or request access as detailed in the Access and Correction section below.

### **Access and Correction**

Upon your request, we will work with the relevant client to provide you with the opportunity to review and correct the contact and any other information that we maintain about you. We cannot provide access to the information contained in passenger or crew databases except to PFM clients directly. Any requests for such information must be first made to the client. If you wish to review the accuracy of the information held by PFM in client databases, you may contact PFM with the client's name, and PFM will, at no cost, contact the client directly with your request to be provided access. PFM cannot tell you the name(s) of the client(s) that have your information in its(their) databases. If such access is granted, PFM will arrange, at no cost, for the data to be reviewed. Any corrections will be forwarded to the PFM client for action. If access is not granted, PFM will notify you of that decision and provide you with the contact information for the client.

If you wish to review the accuracy of the information or opt-in/opt-out for data you have provided to PFM directly, please send an email request to [pfm@pfmsys.com](mailto:pfm@pfmsys.com).

You can also contact us by mail:

Professional Flight Management, Inc.  
555 E City Ave, Bala Cynwyd, PA 19004.  
Tel: 610.688.1655  
Fax: 484.270.9837  
Email: [pfm@pfmsys.com](mailto:pfm@pfmsys.com)

PFM will promptly notify clients if any unauthorized person accesses, uses, or discloses any Personal Information or if any individual requests access to, correction of, or revokes consent for the use of personal information. Further, PFM either returns or destroys all Personal Information and other tangible materials that are client Confidential Information on request after a contract.

### **Privacy Complaints by European Union, United Kingdom, and Swiss Citizens**

In compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-EU DPF Principles, PFM commits to resolve complaints about your privacy and our collection or use of your personal information. European Union, United Kingdom, and Swiss individuals with inquiries or complaints regarding this privacy policy should first contact PFM at:

Professional Flight Management, Inc. Attn: Phil Barnes  
555 E. City Ave  
Bala Cynwyd, PA 19004, USA  
Or  
Email: phil@pfmsys.com

PFM has further committed to refer unresolved privacy complaints under the Data Privacy Framework Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you.

If your dispute or complaint can't be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf>

## **Security**

We use industry-standard encryption technologies when transferring and receiving sensitive data. We have security measures in place within our physical facilities to protect against the loss, misuse or alteration of information that we have collected from or about you.

## **Changes to This Privacy Policy**

Occasionally, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. Any material changes to this privacy policy will be communicated to users through this Web page, so please visit this page periodically.

## **Questions**

Please be assured that we take your privacy concerns quite seriously and intend to make every reasonable effort to protect your privacy. Please contact us directly if you have any questions about PFM's privacy practices.