

Zenith Aviation Ltd

PRIVACY POLICY: HOW WE USE YOUR INFORMATION

Zenith Aviation Ltd are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure. For the purpose of the data protection law the data controller will be Zenith Aviation Ltd.

This policy explains how we will collect, store, use and share your personal information. We collect information in a number of ways including when you use our website, submit an application form or provide information to us by post, email, phone or text.

About us

We are Zenith Aviation Ltd. We offer a bespoke aircraft service ranging from charter flights for business or leisure, professional maintenance of your private jet, professional aircraft acquisition and sales service, and tailored management solutions, including EASA Part-NCC assistance. We are part of the Markerstudy Group of companies. We can be contacted at:

Hanger 529
Churchill Way
Biggin Hill Airport
Kent
TN16 3BN

Explanation of some of the terms used

Data Controller – means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data

Data Protection Law – the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998/2018.

Markerstudy Group – details of the Markerstudy Group can be found at [www.markerstudygroup.com/about us](http://www.markerstudygroup.com/about-us)

Sensitive Information – this is also known as **Special Category Data** and includes information revealing, or about a person's racial or ethnic origin, political opinions or trade union membership, religious or philosophical beliefs, health, sex life or sexual orientation, or genetic data and biometric data for the purpose of uniquely identifying a natural person. Information about criminal convictions is often included in this definition.

Data Controllers

For the purposes of the data protection law the data controller for the services we provide to you will be Zenith Aviation Ltd. We are registered with the ICO, registration number Z3434556.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at dataprotection@markerstudy.com.

Please click on the relevant section below for detailed information regarding how we process your information.

Who do we collect information about?

We collect information about the following types of individuals:

- Previous, current and prospective customers
- Brokers
- Passengers
- Employees of client companies
- Users of the Markerstudy group websites

When do we collect information about you?

We collect information about you:

- When you contact us (by phone, email, through our website, third party website or otherwise), complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for goods/services.
- When you register to use our website, subscribe to our services, search for a product, place an order on our website, participate in discussion boards or other social media functions on our website, leave any query or correspondence on our website, enter a competition, promotion or survey or when you report a problem with our website or any other activity undertaken with the Markerstudy group.
- Prior to, during or after a flight
- When you contact us to make a complaint.

What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on whether you are a customer, website user or third party.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy.

We collect and use details on the following:

Personal Information

- General information such as your name, address, date of birth, email address and phone number;
- Financial information such as credit card information;
- Passport Details;
- Gun Licences (if applicable);
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect includes:
 - details of transactions you carry out through our website.
 - information that you provide by filling in forms on our website even if those forms are not submitted.
 - technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time).

- products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- We may use cookies to collect information about how our website is used. Please see our [cookies policy](#) for more information about our use of cookies.

Sensitive Personal Information

Details about your health but only if this information is pertinent to the services to be provided or to report an accident (e.g. medical conditions requiring special dietary requirements or seating arrangements).

We do not actively request details about your religion but this information may be recorded if it is provided by you or third party as being relevant to the services e.g. your religion requires us to remove food or alcohol whilst on board.

We do not actively request details about your race or ethnicity but this may be recorded from the passport information received if pertinent to the services and or required by a regulator or government agency.

We do not actively request details about any other forms of Special Category Data (political views, genetic/biometric data and sex and/or sexual orientation) or criminal records.

How do we collect your information?

We collect personal information from a number of different sources including:

- Directly from you or from someone else on your behalf;
- From third parties (including brokers, business partners, suppliers, payment and delivery services, analytics providers, search information providers);
- Other publically available sources, including, but not limited to, social media.

What are the purposes for which information about you is used?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

<p>a) We collect and use your personal data to enable us to provide contracted services.</p> <p><i>Legal grounds:</i></p> <ul style="list-style-type: none"> ● Our having an appropriate business need to use your information to provide the contracted services which does not overly prejudice you. <p><i>Additional legal ground for sensitive personal information:</i></p> <ul style="list-style-type: none"> ● Either because you have provided us with your explicit consent or because the use is necessary in order for us to provide the contracted services which does not overly prejudice you.
<p>b) Complying with our legal or regulatory obligations e.g. reporting of accidents to Health & Safety or as part of police investigations</p> <p><i>Legal grounds:</i></p>

- The use is necessary in order for us to comply with our legal obligations
- The use is necessary in order for us to establish, exercise or defend our legal rights

Additional legal ground for sensitive personal information:

- Either because you have provided us with your explicit consent or because the use is necessary in order for us to establish, exercise or defend our legal rights

c) To transfer to third parties for the purpose of providing you with the services required under the contract.

Legal grounds:

- Our providing the contracted services
- Legal or regulatory obligations

Additional legal ground for sensitive personal information:

- Either because you have provided us with your explicit consent or because the use is necessary in order for us to provide the contracted services which does not overly prejudice you.

d) Communicating with you and resolving any complaints that you might have

Legal grounds:

- Our providing the contracted services
- Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you

Additional legal ground for sensitive personal information:

- Either because you have provided us with your explicit consent or, because the use is necessary in order for us to establish, exercise or defend our legal rights

e) Recover outstanding payments

Legal grounds:

- Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you

Additional legal ground for sensitive personal information:

- because the use is necessary in order for us to establish, exercise or defend our legal rights

f) To notify you about changes to our services or products

Legal grounds:

- Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.

g) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

Legal grounds:

- Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you.

g) To transfer within the Markerstudy Group or to third parties for the purpose of conducting internet analytics.

Legal grounds:

- Our having an appropriate business need to use your information to maintain our websites and undertake website analytics which does not overly prejudice you.

CCTV Usage

We do not operate CCTV, however Biggin Hill Airport does. Please refer to their website for details about their CCTV policy and privacy policy

Who do we share the information we collect about you with?

Sharing with third parties

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Business partners
- Brokers
- Suppliers including Handling Agents
- Payment and delivery services
- Analytics providers

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website.
- Prospective buyers, in the event that we sell any business or assets.
- Regulators and other authorised bodies, whenever we are required to do so by law.

What is our approach to sending information overseas?

We may send your data outside the European Economic Area (EEA) for processing and storage and in order to comply with regulatory airline requirements.

If we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards. You may contact us to request further information about such transfers and the steps we have taken to protect your personal data].

How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. You may contact us to request further information about our retention periods.

Please note that we retain passenger information until the passport expires to facilitate and improve repeated service requests.

Automated decision making

We do not carry out any automated decision making

What marketing activities do we carry out?

We do not actively market our products & services directly to you

Your rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

Please note that in some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

Your rights include:

The right to access your personal information

You have the right to access a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

If you would like access to such information, please write to us at Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB. Alternatively, where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure

In certain circumstances, you may ask us to erase your personal information.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information.

The right to data portability

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time.

The right not to be subject to automated decision-making (including profiling)

You have a right not to be subject to a decision based solely on automated means.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the ICO

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

More information can be found on the ICO's website at: www.ico.org.uk/concerns.

Making a complaint will not affect any other legal rights or remedies that you have.

How we protect your information

We will treat all of your information in strict confidence and we will endeavour to take all reasonable steps to keep your personal information secure once it has been transferred to our systems. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, and data stored on our IT systems, the website(s) and associated databases.

Changes to our Privacy Policy

We keep our Privacy Policy under review and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 31st July 2018.

How to Contact Us

Please contact us if you have any questions about our Privacy Policy or information we hold about you by email to dataprotection@markerstudy.com or write to: Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB.

Other websites

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

Complaints

If you have a complaint about how we use your information then please contact us at: Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB.

If you have a complaint about the way in which your data has been processed, you can contact the ICO at: www.ico.org.uk/concerns.