

Privacy Policy

1. General

Zulupilots (whose registered office is at 67 BIS RUE RAYMOND POINCARÉ, LAXOU, FRANCE) (“Zulupilots”, “we”, “our” or “us”), acting as data controller, is committed to protecting and respecting your privacy. This notice (the “Privacy Notice”) is designed to tell you about our practices regarding the collection, use and disclosure of information that you may provide via this website or the “Platform“. This Privacy Notice, together with our Terms and Conditions sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

2. Information collected from you and duration

We may collect and process the following data about you:

2.1. The information you give us

You may give us information, including information that can identify you (“Personal Data“), when you use our Platforms, by filling in forms on the Platforms (such as the sign-up form), when you enter into any of our competitions, promotions or surveys, when you correspond with us by phone, e-mail or otherwise, and when you report a problem with our Platforms.

The information you give us may include:

2.1.1. Mandatory information required to register for the service we provide on our Platforms or to access other services provided by us, including your name, email address, mobile phone number, IP address, and password are required. All these fields are mandatory. Zulupilots will not be able to provide you with the services offered on our Platforms if the required information is not provided, consequently, you will not be able to register for a user account on our Platforms

2.1.2. A photograph;

2.1.3. A postal address;

2.1.4. Details of your qualifications;

2.1.5. Your experiences;

2.1.6. A record of any correspondence between you and us;

2.1.7. A record of any requests you have made or related adverts you have placed with or through our Platforms;

2.1.8. Details of accounting or financial transactions including transactions carried out through our Platforms or otherwise. This may include information such as your payment card or bank account details, details of training sessions that you have offered through our Platforms;

2.1.9. Details of your visits to our Platforms and the resources that you access;

2.1.10. Your replies to any surveys or questionnaires, such as your reviews on the training sessions you have shared with other members of our community. Such information may be used for analytic & user understanding purposes;

2.1.11. Information we may require from you when you report a problem with our Platforms or our service, such as the subject of your request for support;

2.1.12. Location information when you have given consent to the collection and processing of this data;

2.1.13. Certificates and other documents that you have agreed to provide to us.

2.2. Information we collect automatically

2.2.1. If you sign up via social media authentication methods or via your Google account, Zulupilots will access certain Personal Data (e.g. first name, surname, picture, email, number of Facebook friends, etc.) in your social media or Google account pursuant to the applicable terms and conditions of these social media platforms.

2.2.2. With regard to each of your visits to our Platforms we may collect, in accordance with applicable laws and where required with your consent, information relating to the devices you use and the networks you are connected to when using our services. This may include the following information: your IP address, log-in information, browser type and version, browser plug-in types and versions, operating system and platform, advertising identifier, information about your visit including the URL clickstream to, through and from our Platforms, products you viewed or searched for, download errors, length of visits to certain pages, page interaction and any phone number used to call our customer service number. We collect this information through the use of various technologies including cookies.

2.2.3. We also collect aggregated information regarding your activity on our Platform (such as the amount of training sessions offered, your message response rate, etc.). Such information may be published on your public profile on our Platform.

2.3. Data retention

Your data will be retained and secured indefinitely unless you explicitly request the complete deletion of all your data. To do so, please send a message via our contact section on the website.

3. Use of the information collected from you

We will use the information we collect for the following purposes:

PURPOSE 3.1. to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you requested from us;

LEGAL BASIS

This processing is necessary for the performance of our mutual contractual obligations.

PURPOSE 3.2. to send you service-related information by email and/or text message and/or any other communication means ;

LEGAL BASIS

This processing is necessary for the performance of our mutual obligations and/or carried out with your consent.

PURPOSE 3.3. to collect payments from you or to transfer to you the payments we collect on your behalf;

LEGAL BASIS

This processing is necessary for the performance of our mutual contractual obligations.

PURPOSE 3.4. to enable you to personalise your user profile on our Platforms;

LEGAL BASIS

This processing is carried out with your consent.

PURPOSE 3.5. to enable you to communicate and interact with other members about our services or about the trips(s) you have/will share with other members and/or to organise such trips;

LEGAL BASIS

This processing is necessary for the performance of our mutual contractual obligations and/or carried out with your consent.

PURPOSE 3.6. to give you access to our support services and to enable you to communicate with our member relations team;

LEGAL BASIS

This processing is (i) necessary for the performance of our mutual contractual obligations, (ii) carried out with your consent and/or (iii) necessary for the establishment, exercise or defence of legal claims.

PURPOSE 3.7. to ensure compliance with (i) applicable laws, (ii) our Terms and Conditions, and (iii) our Privacy Notice. Certain breaches that we regard as inappropriate may lead to the suspension of your account;

LEGAL BASIS

This processing is necessary (i) for the performance of our mutual contractual obligations, (ii) for compliance with our legal obligations and/or (iii) for the establishment, exercise or defence of legal claims.

PURPOSE 3.8. to send you, in accordance with applicable laws and where required, with your consent, marketing materials and information necessary to facilitate the service or the training session request process and to make your suggestions and recommendations about goods or services related to our services that may interest you. We also use your data to target you in order to serve our ads on social media platforms. You can learn more about how these features work, and the data that we obtain about you, by visiting the relevant sections of the third party social media platforms; and

LEGAL BASIS

This processing is based on your consent and/or our legitimate interest (i.e. providing you with meaningful advertising).

PURPOSE 3.9. to notify you about changes to our services;

LEGAL BASIS

This processing is necessary (i) for the performance of our mutual contractual obligations, (ii) for compliance with our legal obligations and/or (iii) the establishment, exercise or defence of legal claims.

PURPOSE 3.10. to verify the information contained on your certificates and other documents that may be collected from you at the time of registration or at any other time during your use of our Platforms;

LEGAL BASIS

This processing is based on (i) your consent, (ii) carried out for the establishment, exercise or defence of legal claims and/or (iii) for compliance with our legal obligations.

PURPOSE 3.11. to administer our Platforms and for internal operations, including troubleshooting, data analysis, testing, research, analytic and survey purposes;

LEGAL BASIS

This processing is based on our legitimate interest (i.e. ensuring the security of our Platforms and improving its features).

PURPOSE 3.12. to improve our Platforms to ensure that content is presented in the most effective manner for you and for your device;

LEGAL BASIS

This processing is based on our legitimate interest (i.e. providing you with meaningful content).

PURPOSE 3.13. to allow you to participate in interactive features of our service, when you choose to do so;

LEGAL BASIS

This processing is necessary (i) for the performance of our mutual contractual obligations and/or (ii) based on your consent.

PURPOSE 3.14. as part of our efforts to keep our Platforms safe and secure; and

LEGAL BASIS

This processing is based on (i) our legitimate interest (ensuring the security of our Platforms), (ii) carried out for the establishment, exercise or defence of legal claims and/or (iii) for compliance with our legal obligations.

PURPOSE 3.15. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

LEGAL BASIS

This processing is based on (i) our legitimate interest (i.e. measuring and optimising the efficiency of our advertising campaigns) and/or (ii) your consent.

4. Recipients of the Information collected from you and purposes

4.1. When you use our services, some information about you is shared with the members of our communities, either on your public profile or

during the request process (e.g. we give your telephone number to the members with whom you will have a training session with).

4.2. We may receive and send information about you, including your Personal Data, if you use any of the platforms we operate or from other Zulupilots entities and affiliates, for the purposes outlined in this Privacy Notice.

4.3. We are also working closely with third parties which may be the recipients of your Personal Data such as:

- our business partners who are social media platforms and which may provide you with connecting services, such as the connection of the information of your profile, from their social media platforms to our Platforms;
- our business partners who may advertise their services on our Platforms and to which you may decide to sign up for: these services may be any service related to our services such as network services, banking services, etc;
- our business partners who may advertise our services on their websites;
- our sub-contractors in technical, payment services, or analytics providers.

4.4. We only share your Personal Data with any of these third parties in the following cases:

4.4.1. Where it is necessary to involve a third party service provider, for the performance of any contract we enter into with you in order to facilitate or extend our services;

4.4.2. As part of the request process and in order to provide the services, information such as your name, photography, mobile phone number and/or email address, may be displayed on the Platforms and/or passed on to professionals instructors & examiners (if you are a student) or a students (if you are a professional instructor & examiner);

4.4.3. As part of our rating system, the reviews you write will be published on the Platform. The reviews including your abbreviated name and photography are visible to all visitors of the Platforms;

4.4.4. We use analytics and search engine providers to assist us in the improvement and optimisation of our Platform;

4.4.5. It is explicitly requested by you ;

4.4.6. We may distribute parts of our Platform (including the training sessions you have posted) for display on our business partners' websites through API or widgets. In these cases, some information from your public profile may be displayed on these websites;

4.4.7. Zulupilots may also disclose your information if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (i) respond to claims asserted against Zulupilots, (ii) to comply with legal proceedings, (iii) to enforce any agreement with our users such as our Terms and Conditions and our Privacy Policy, (iv) in the event of an emergency involving the

danger of public health, death or physical injury to a person (v) in the framework of investigation or (vi) to protect the rights, property or personal safety of Zulupilots, its members or others ;

4.4.8. In the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets; and

4.4.9. If Zulupilots or all or part of its assets are acquired by a third party, in which case Personal Data held by it about its members will be one of the transferred assets.

4.4.10. We draw your attention to the fact that if you decide to let us access some of your information, including your Personal Data, through connection services provided by our business partners, their privacy policies are equally applicable to you. We have no control over the collection or processing of your data by our trading partners on their own platform.

4.4.11 You authorise us to use your name, your profile picture, your content as part of commercial, sponsored or related content that we distribute or improve.

4.5. In accordance with applicable laws and where required with your consent, we may combine information about you, including your Personal Data and cookie information, we send to and receive from our business partners. We may use this information and the combined information for the purposes set out above.

4.6. We draw your attention on the fact that if you decide to share your information, including Personal Data, with us through our business partners' connecting services, any of our business partners' privacy policies and/or notices may also be applicable to you, in addition to this Privacy Policy. We do not control the collection and/or the processing of your information eventually made by our business partners on their own platforms.

5. Messages moderation

We may review, scan, or analyse the messages you exchange with other members of our community through our Platforms for fraud prevention, service improvement, customer support purposes, enforcement of the contracts entered into with our members (such as our Terms and Conditions). For example, in order to prevent the circumventing of our online search engine, we may scan and analyse messages sent through our Platforms to check that they do not include any contact details or references to other websites.

6. Targeted ads on social media platforms and communications sent by email and/or text messages

In accordance with applicable laws and where required with your consent, we may use the information you give us on our Platforms for electronic direct marketing purposes (e.g. (i) receiving our newsletters,

invitations to our events or other communications that we think may interest you or (ii) serving you with targeted advertising on social media platforms or third parties websites).

For targeted ads and content: on social media (e.g. Facebook, Instagram and LinkedIn): you can object at any time by configuring your settings regarding advertisement via your social media account.

7. Information transferred

In principle, we store the Personal Data that we hold about you in the European Union (“EU“). However, since for example some of our service providers are based in countries outside of the European Union (“third countries”), we also transfer some of your data to third countries. This may include third countries where the European Commission has not taken the decision that such third country ensures an adequate level of protection (for example the United States). In that case, we ensure that the transfer is performed in accordance with the applicable legislation and that appropriate safeguards have been put in place (especially standard contractual clauses as issued by the European Commission) in order to guarantee a sufficient level of protection of individuals’ private life and fundamental rights.

By sending a request to the contact section in the website, we can provide you with the details regarding such appropriate safeguards.

8. Rights in respect of personal data

8.1. You are entitled to receive a copy of your personal data that is in our possession (your right of data access).

8.2 You may request the deletion of personal data or the correction of inaccurate personal data (your right to erasure and rectification). Please note that we may keep certain information concerning you, as required by law, or when we have a legal basis to do so (e.g., our legitimate interest to keep the platform safe and secure for other users).

8.3 You have the right to object at any time (i) to the processing of your personal data for the purpose of direct marketing, or (ii) to the processing of your personal data for other purposes on grounds relating to your particular situation (your right to object to processing). Please note that in the latter case, this right only applies if the processing of your personal data is based on our legitimate interest.

8.4 You have the right to restrict the processing of your personal data (your right to restriction of processing). Please note that this only applies if (i) you contested the accuracy of your personal data and we are verifying the accuracy of the personal data, (ii) you exercised your right to object and we are still considering, as foreseen by the applicable law, whether our legitimate grounds to process your personal data in that case override your interests, rights and freedoms; or (iii) your personal data has been processed by us in an unlawful way but you either oppose the erasure of the personal data or want us to

keep your personal data in order to establish, exercise or defend a legal claim.

8.5 You have the right to receive and/or have us transfer to another data controller a subset of personal data, that concern you and that you provided us with, and which we process for the performance of our contract or because you previously consented to it, in a structured, commonly used and machine-readable format (your right to data portability).

8.6 To exercise your rights, please contact the Group Data Protection Officer (see under Article 12).

8.7. You also have the right to make a complaint to the relevant data protection supervisory authority or to seek a remedy through the courts if you believe that your rights have been breached.

9. Confidentiality of password

Where you have chosen a password which enables you to access certain parts of our Platforms, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Links to other websites and social media

Our Platforms may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy practices and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

11. Changes to Privacy Policy

Any changes we may make to our Privacy Notice in the future will be posted on this page. Where appropriate, we will notify you or seek your consent. Please check back frequently to see any updates or changes to our Privacy Policy.

12. Contact & Data Protection Officer

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry relating to your Personal Data, please use our contact page.