



Privacy Policy

We are pleased that you are visiting our website at www.polaris-flight.com. Data protection and data security when using our website are very important to us. We would therefore like to inform you which of your personal data we collect when you visit our website and for what purposes it is used.

Who is responsible?

The person responsible in the sense of Belgium's Law on the protection of individuals with regard to the processing of personal data of 30 July 2018 (the Framework Act) ("DPA") and the EU's General Data Protection Regulation ("GDPR") is Polaris-Flight of Chaussée de Roodebeek, 206, 1200 Brussels, Belgium ("Polaris-Flight", "we", "us", or "our"). Please direct any questions you may have to contact@polaris-flight.com, or use our [Contact Form](#).

Principles of data processing

a) *Personal data*

Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior.

b) *Processing*

The processing of personal data (e.g. collection, retrieval, use, storage or transmission) always requires a legal basis.

c) *Legal basis*

In accordance with the DPA and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: i) you have given your consent, ii) the data is necessary for the fulfillment of a contract / pre-contractual measures, iii) the data is necessary for the fulfillment of a legal obligation, or iv) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

d) *Retention*

Processed personal data will be deleted as soon as the purpose of the processing has been achieved and there are no longer any legally required retention obligations.

Data we collect

a) *Provision and use of the website*

When you call up and use our website, we collect the personal data that your browser automatically transmits to our server. This is technically necessary for us to display our website and to ensure its stability and security. In this sense, we collect the following data: i) IP address of the requesting computer, ii) Date and time of access, iii) name and URL of the file accessed, iv) website from which the access was made (referrer URL), v) browser used and, if applicable, the operating system of your computer as well as the name of your access provider. The legal basis is our legitimate interest.

b) *Hosting*

The hosting service used by us for the purpose of operating our website is [PulseHeberg](#). In doing so PulseHeberg processes inventory data, contact data, content data, usage data, meta data and communication data of customers, interested parties and visitors of our website and services, on the basis of our legitimate interests.

c) *Economic analyses and market research*

For business reasons, we analyze the data we have on web and server traffic patterns, website interactions, browsing behavior etc. The analyses serve us alone and are not disclosed externally and processed using anonymous analyses with summarized and or anonymized values. For this purpose we use [StatCounter](#). The legal basis is our legitimate interest and your consent. For further information on our use of StatCounter, please refer to our Cookie Policy.



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d) Cookies

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies: i) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and ii) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyze your behavior on a website (“analytical” cookies) or cookies used to display advertisements to you (“advertising” cookies).

As set out in Belgium’s Electronic Communications Act of 13 June 2005, the Code of Economic Law (the “CEL”), the Royal Decree of 4 April 2003 on the sending of advertising by email (the “RD”) and the EU’s Privacy and Electronic Communications Directive (“PECD”), we need to obtain consent for the use of Non-essential Cookies. For further information on the cookies we use, please refer to our Cookie Policy. The legal basis for processing is our legitimate interest and your consent.

e) Cookie consent

Our website uses a cookie consent management tool to obtain your consent to the storage of cookies and to document this consent. When you enter our website, the following Personal Data is transferred to us via Hu-manity: i) Your consent(s) or revocation of your consent(s); ii) Your IP address; iii) Information about your browser; iv) Information about your device; v) Time of your visit to our website. The basis for processing is our legitimate interest.

f) Contacting Us

We offer you the opportunity to contact us using various methods. We collect the data you submit such as your name, email address, telephone number and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

g) When using our services and my.polaris-flight

We process the Personal Data involved in your use of our services (“Service Data”) in order to be able to provide our contractual services. This includes in particular your email address and a password to create an account for you, or for our support, correspondence with you, invoicing, fulfillment of our contractual, accounting and tax obligations. Accordingly, the data is processed on the basis of fulfilling our contractual obligations and our legal obligations.

We recognize that you own your Service Data. We provide you complete control of your Service Data by providing you the ability to (i) access your Service Data, (ii) share your Service Data through supported third-party integrations, and (iii) request export or deletion of your Service Data. Where we process Service Data as Data Processor or in other words on behalf of you, we will process the Service Data involved in your use of our services in accordance with your instructions and shall use it only for the purposes agreed between you and us.

We ensure that access by our employees to your data is only available on a need-to-know basis, restricted to specific individuals, and is logged and audited. We communicate our privacy and security guidelines to our employees and enforce privacy and protection safeguards strictly.

h) Support ticket

If you create a support ticket, we will request Personal Data and, where applicable, non-Personal Data in accordance with your request, this may include your name, email address and other order related data you voluntarily provide. The data provided is not shared with third parties and cannot read your data when it is entered. If you submit a support ticket, we process the data for the purpose of processing and handling your ticket.

Our employees will also have access to data that you knowingly share with us for technical support or to import data into our services. We communicate our privacy and security guidelines to our



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employees and enforce privacy safeguards strictly. The legal basis of the data processing is our obligation to fulfill the contract and/or our legitimate interest in processing your support ticket.

i) Administration, financial accounting, office organization, contact management

We process data in the context of administrative tasks as well as organization of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

j) Social Media

When you visit our social media profiles on Social Media (currently, [Facebook](#) and [LinkedIn](#)), we process your actions and interactions with our profile (e.g., the content of your messages, enquiries, posts or comments that you send to us or leave on our profile or when you like or share our posts) as well as your publicly viewable profile data (e.g., your name and profile picture). Which Personal Data from your profile is publicly viewable depends on your profile settings, which you can adjust yourself in the settings of your social media account. The legal basis is our legitimate interest and your consent.

Data Security

We undertake to protect your privacy and to treat your personal data confidentiality. In order to prevent manipulation or loss or misuse of your data stored with us, we take extensive technical and organizational security precautions which are regularly reviewed and adapted to technological progress. These include, among other things, the use of recognised encryption procedures (SSL or TLS).^{[1][2][3][4][5][6][7][8][9][10][11][12][13][14][15][16][17][18][19][20][21][22][23][24][25][26][27][28][29][30][31][32][33][34][35][36][37][38][39][40][41][42][43][44][45][46][47][48][49][50][51][52][53][54][55][56][57][58][59][60][61][62][63][64][65][66][67][68][69][70][71][72][73][74][75][76][77][78][79][80][81][82][83][84][85][86][87][88][89][90][91][92][93][94][95][96][97][98][99][100]}

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures are not observed by other persons or institutions that are not in our area of responsibility. We have no technical influence on this. It is the user's responsibility to protect the data he or she provides against misuse by encrypting it or in any other way.

International transfers

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

How we may share your Personal Data

We may share your Personal Data with our Business Partners for the purposes described in this Privacy Policy, including (but not limited to) conducting the services you request, or customizing our business to better meet your needs. We share your Personal Data only with Business Partners who agree to protect and use your Personal Data solely for the purposes specified by us.

We may also disclose your Personal Data for any purpose with your consent or for law enforcement, fraud prevention or other legal actions as required by law or regulation, or if we reasonably believe that we must protect us, our customers or other business interests. Except as described above of which you will be informed in advance, we will not disclose your Personal Data.

What we do not do

- We do not request Personal Data from minors and children;
- We do not use Automated decision-making including profiling; and
- We do not sell your Personal Data.

Privacy rights

Under the DPA and the GDPR, you can exercise the following rights:



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- *Right to information*
- *Right to rectification*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*
- *Right to complain to a supervisory authority*
- *Right not to be subject to a decision based solely on automated processing.*

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

Updating your information and withdrawing your consent

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing or want to withdraw any consents you have given us, please contact us.

Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in relation to our services is L'Autorité de protection des données - Gegevensbeschermingsautoriteit (the "Data Protection Authority"), Rue de la Presse - Drukpersstraat 35, 1000 Brussels, Belgium, www.apd-gba.be. However, we would appreciate the opportunity to address your concerns before you contact the Data Protection Authority.

Validity and questions

This Privacy Policy was last updated on Thursday, 11th of January, 2023, and is the current and valid version. However, from time to time changes or a revision to this policy may be necessary.

If you have any questions about this policy or our data protection practices, please contact us using contact@polaris-flight.com, or use our [Contact Form](#).