



**PRIVACY POLICY**

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<b>For Use By:</b>	<b>Customers and all staff where applicable</b>	

Here is the fully comprehensive **Privacy Policy** for Avalon Aero Technical Services Ltd.

This draft accounts for your UK headquarters while specifically addressing data protection requirements for your international operations.

It retains the standard "DPO" terminology (highly recommended for cross-border compliance involving the EU) but formats it clearly to cover global data transfers.

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**Avalon Aero Technical Services Ltd — Privacy Policy**

**Introduction**

Welcome to the Avalon Aero Technical Services Ltd privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy informs you how we look after your personal data when you interact with us as a client, supplier, or visitor to our website (regardless of where you access it from). It also details your privacy rights and how global data protection laws protect you.

This privacy policy is structured in an accessible format so you can navigate directly to the specific areas set out below. Please also use the Glossary at the end of this document to understand the meaning of some of the terms used.

- Important information and who we are
- The data we collect about you
- How is your personal data collected?
- How we use your personal data
- Disclosures of your personal data
- International transfers
- Data security



- Data retention
- Your legal rights
- Glossary

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## Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data, including any data you may provide when you contract with us, request quotes, or contact us through our website.

Our services are aimed strictly at corporate and professional entities within the global aviation industry. This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and is not intended to override them.

### Controller & Data Protection Officer (DPO)

Avalon Aero Technical Services Ltd is the controller and responsible for your personal data (collectively referred to as “Avalon”, “we”, “us” or “our” in this privacy policy).

Because we operate internationally and serve clients in the European Union (EU), we have maintained a **Data Protection Officer (DPO)** who is responsible for overseeing compliance with the UK GDPR, EU GDPR, and applicable international data privacy frameworks. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### Contact details

Full name of legal entity: **Avalon Aero Technical Services Ltd** Email address: [info@aatscamo.co.uk](mailto:info@aatscamo.co.uk)

Postal address: **The Crown (Suite G), London Road, Westerham, TN16 1DJ, United Kingdom**

Telephone number: **+44 (0)1959 574825**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). If you are based in the EU, you have the right to lodge a complaint with your local Supervisory Authority. We would, however, appreciate the chance to deal with your concerns before you approach a regulator, so please contact us in the first instance.

### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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## The data we collect about you



Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, username or similar identifier, title, or job role.
- **Contact Data:** includes corporate billing address, delivery address, corporate email address, and telephone numbers.
- **Financial Data:** includes bank account, corporate payment card details, and credit check information.
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data:** includes your username and password, purchases or orders made by you, technical interests, preferences, feedback, and survey responses.
- **Usage Data:** includes information about how you use our website, products, and services.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when your organization requests a quote, enters into a service contract, or contacts us.
  - **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy for details on how we restrict these technologies until you opt-in.
  - **Third parties or publicly available sources:** We may receive technical, commercial, and professional data about you from various global third parties and public sources, such as analytics providers (e.g., Google Analytics), international aviation safety registries (e.g., CAA, EASA, FAA databases), and official corporate registries (such as Companies House).
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## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with your organisation.
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- Legitimate Interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). This section reflects the requirements of the UK GDPR and Data Protection Act 2018 as currently in force.

For the avoidance of doubt:

An activity that may constitute a Legitimate Interest includes, but is not limited to:

- Direct marketing (although this does not override the requirement for consent under [Privacy and Electronic Communications \(EC Directive\) Regulations 2003 \(SI 2003/2426\)](#));
- Intra-group transmissions of personal data for internal administrative purposes; and
- Ensuring the security of network and information systems.

In the certain limited statutory scenarios, including where processing is necessary for public interest purposes such as crime prevention or safeguarding, a separate balancing exercise may not be required where the applicable legal conditions are met. These include::

- Disclosure to a controller that requires the personal data to carry out a public interest task or to exercise its official authority where the controller has requested that data;
  - Safeguarding national security, protecting public security and defence purposes;
  - Responding to an emergency defined in the [Civil Contingencies Act 2004](#);
  - Detecting, investigating or preventing crime, or apprehending or prosecuting offenders; and
  - Safeguarding vulnerable individuals.
- Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
  - In certain limited statutory scenarios (for example where processing is necessary for public interest purposes such as crime prevention or safeguarding), a separate balancing exercise may not be required where the statutory conditions are met. In all other cases, we will carry out a balancing exercise to ensure our interests do not override your fundamental rights and freedoms.
  - Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
  - In all other cases, we will carry out a balancing exercise to ensure that our legitimate interests do not override your fundamental rights and freedoms.

## Marketing

We provide clear choices regarding certain personal data uses around marketing and advertising.



- Corporate Marketing Framework:** Because our operations are strictly B2B, we may send marketing communications to corporate contact numbers or email addresses under the "soft opt-in" regime (or local equivalent legitimate interest provisions), provided you have not previously opted out.
- Third-Party Marketing:** We will obtain your explicit opt-in consent before we share your personal data with any external third party for marketing purposes.
- Opting out:** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message or by contacting us directly. This will not apply to personal data processed as a result of active service delivery, regulatory compliance, or other transactional interactions.
- Where cookies or electronic marketing communications are concerned, we will comply with the Privacy and Electronic Communications Regulations 2003 (PECR), including obtaining consent where required or relying on the soft opt-in where applicable.

Purpose / Activity	Type of Data	Lawful Basis for Processing
<b>To register your organization as a client</b>	(a) Identity  (b) Contact	Performance of a contract with you
<b>To deliver technical and CAMO services, including:</b>  (a) Managing payments, fees, and charges  (b) Debt recovery	(a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications	(a) Performance of a contract  (b) Necessary for our legitimate interests (to recover debts due to us)
<b>To manage our international client relationship, including:</b>	(a) Identity	(a) Performance of a contract



Purpose / Activity	Type of Data	Lawful Basis for Processing
<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Requesting professional feedback or surveys</p> <p>(c) Dealing with your requests, complaints and queries</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep records updated, review service delivery standards and manage our client relationship with you)</p>
<p><b>To administer and protect our global business and website including:</b></p> <p>(a) Troubleshooting</p> <p>(b) Data analysis</p> <p>(c) Testing</p> <p>(d) System maintenance</p> <p>(e) Support</p> <p>(f) Reporting</p> <p>(g) Hosting of data</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p><b>To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing</b></p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>(a) Consent (where non-essential cookies are involved); OR</p> <p>(b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our</p>



Purpose / Activity	Type of Data	Lawful Basis for Processing
		business and to inform our marketing strategy))
<p><b>To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data</b></p>	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)  (b) Consent, having obtained your prior consent to receiving direct marketing communications
<p><b>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</b></p>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

**Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above:

- **External Processors:** Specialized IT, cloud infrastructure, and software-as-a-service (SaaS) providers based in the UK, EU, or US.
- **Professional Advisers:** Lawyers, bankers, auditors, and insurers providing corporate services.
- **Aviation Authorities and Regulators:** Official regulatory bodies acting as joint controllers or processors—such as the UK Civil Aviation Authority (CAA), the European Union Aviation Safety Agency (EASA), the US Federal Aviation Administration (FAA), or other relevant international aviation authorities—where disclosure is necessary for airworthiness management, statutory certification, or reporting.

We require all third parties to respect the security of your personal data and to process it only in accordance with our documented instructions and applicable law. Appropriate contractual safeguards are put in place to ensure that such processing is carried out securely and in compliance with data



protection legislation.

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### International transfers

Because Avalon Aero Technical Services Ltd manages airworthiness and technical support for clients globally, your personal data will be processed across international borders.

Whenever we transfer personal data out of the UK or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- **Adequacy Decisions:** We may transfer data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government and/or European Commission (e.g., transfers between the UK and the EEA).
  - **Standard Contractual Frameworks:** Where we exchange data with clients or vendors in jurisdictions without adequacy agreements, secure the transfer using legally binding mechanisms. These include the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses (SCCs), or the UK-US Data Bridge, ensuring enforcement of your data subject rights.
  - **Contractual Necessity:** Where data must be shared with foreign regulatory bodies or handling agents to secure cross-border aircraft approvals, parts shipping, or mandatory technical certifications on your behalf, processing is performed under contractual and regulatory necessity frameworks.
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### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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### Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

In certain circumstances, we may retain data for longer where there is a reasonable prospect of litigation or where required by applicable regulatory frameworks (including aviation industry requirements).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, and the specific statutory requirements dictated by **aviation safety bodies (e.g., CAA, EASA)** which frequently require long-term maintenance records to accompany aircraft profiles.



By law, we must keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for six years after they cease being customers for tax purposes.

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## Your legal rights

Under data protection laws (including the UK GDPR and EU GDPR), you have specific rights in relation to your personal data:

- **Request access** to your personal data (Data Subject Access Request).
- **Request correction** of your data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your data (where there is no overriding legal or regulatory reason to retain it). This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **Object to processing** of your data where we rely on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **Request restriction of processing** of your data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your data to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent** at any time where consent is the primary lawful basis. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you are a resident of certain international jurisdictions with localized privacy acts, we recognize and respect your native statutory rights regarding data transparency and deletion.

If you wish to exercise any of the rights set out above, please contact our DPO at [info@aatscamo.co.uk](mailto:info@aatscamo.co.uk).



## Glossary

- **Legitimate Interest** means the interest of our business in conducting and managing our operations to enable us to give you the best service and the most secure experience. We balance any potential impact on you before processing your data.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which your organization is a party.
- **Comply with a legal obligation** means processing your data where it is necessary for compliance with statutory laws, including global civil aviation directives.
- **Consent** means affirmative, explicit agreement given by you via an active choice (such as our cookie banner controls).