

Privacy Policy of the Official Website (www.helicopters.ge) of “Aero Expedition” LLC

The administration of the website www.helicopters.ge is committed to maintaining the confidentiality of your personal information in the online environment. We place great importance on protecting the data you provide to us. Our Privacy Policy complies with the Law of Georgia on Personal Data Protection and the European Union General Data Protection Regulation (GDPR). The purposes for which we collect your personal data include: improving our services; communicating with visitors to this website; processing user data for analytical purposes; providing information requested by users; delivering services related to the functionality and specifications of the website; and performing other actions listed below that are necessary to ensure the provision of services already provided or to be provided.

Who We Are:

“Aero Expedition” LLC (hereinafter referred to as “**Expedition**”) is a legal entity registered in accordance with the legislation of Georgia, which, for the purposes of this Privacy Policy, acts as the data controller responsible for the processing of personal data.

Identification Code: 404506183

Phone : (+995 32) 599 18 70 70

Legal Address: Georgia, Tbilisi, Samgori District, N17 Shalva Chankotadze Avenue.

Email: Office@helicopters.ge

Data Subject:

Any user/visitor of the website.

Storage and Processing of Personal Data

Expedition processes and stores your personal data in accordance with the personal data protection legislation applicable in Georgia. The legal basis for the processing of your personal data by us is the conclusion of a transaction at your request and the fulfilment of the mutual obligations undertaken within the framework of such transaction, as well as the provision of services to you. The collection and processing of your personal data by us is carried out based on your freely given consent, and includes the following data:

- Full name;

- Email address;
- Telephone number;
- Cookies;
- Date of birth;
- Gender;
- Correspondence through electronic communication channels; IP address;
- Other additional information about you (provided voluntarily or required as mandatory fields).

You may always choose not to provide personally identifiable information by refraining from entering such data into the forms or fields available on our website and by not using the available personalized services. In such cases, you may choose alternative forms of communication with us, including a direct visit, telephone communication, or an informational email. The collection and processing of your personal data is carried out in accordance with the legislation of Georgia and the European Union in order to ensure the full protection and proper exercise of your rights.

Data Storage, Modification, and Deletion

A user who has provided their personal data to Expedition has the right to withdraw their consent, request the modification or deletion of their personal data, and cancel the agreement regarding the processing of their data. Your personal data is stored for the duration of your registration on our website. Upon your request to cancel registration and/or deactivate your account, your personal data will be deleted immediately after the request is processed and fulfilled.

The transfer/sharing of your personal data with third parties may only take place in the following cases:

- a) Service Providers: We may share your personal data with third parties — service providers — in order to assist us with the operation and improvement of the website.
- b) Legal Requirements: We may disclose your personal data if required by law or in response to a lawful request from the relevant governmental authorities.
- c) With Your Consent: We may share your personal data with other parties based on your written consent.
- d) Protection of the rights and property of LLC “Aero Expedition”.
- e) Ensuring the safety of users or the public.
- f) Avoiding legal liabilities and obligations.

g) In the above-mentioned cases, we may share your data with the relevant party, provided that such party undertakes, in advance, the mandatory obligation to ensure the security and confidentiality of your personal data.

Processing of Technical Visit Data

Your IP address, visit time, browser settings, operating system, and other technical information may be recorded and accessed when you visit our official website (www.helicopters.ge).

Processing of Cookies

We use cookies to ensure the proper display of website content and to provide a convenient browsing experience on www.helicopters.ge. Cookies are small files stored on your device. They help the website remember information about you, such as the language you use to browse the website and which pages you have already visited. This information may be useful during your subsequent visits. We use different types of cookies:

- **Session Cookies** – used for the proper functioning of the website.
- **Preference Cookies** – used to remember your settings, preferences, and choices.
- **Security Cookies** – used for security purposes.

Cookies make browsing the website much more convenient. You can configure your browser settings to accept or block cookies at your discretion. Disabling cookies may affect or limit the functionality of the website.

Processing of Personal Data by Other Services and Data Transfer

This website uses third-party online services that independently collect data from users. The data collected by these services may be provided to other services operated by the respective organizations. We do not transfer personal data to any other organizations or services that are not specified in this Privacy Policy. As an exception, the collected data may be provided to authorized state authorities upon their lawful request and where such authorities have the legal right to request such information.

In the event that your personal data is shared outside the European Union and the European Economic Area, the company will take all necessary measures to ensure that such data is processed securely and in accordance with this Privacy Policy. The company will carry out international transfers of personal data in compliance with applicable legislation.

This may be carried out in various ways, including, but not limited to:

- The country to which the information is transferred provides an adequate level of protection in accordance with a decision of the European Commission.

- In the absence of an adequacy decision by the European Commission, personal data may be transferred to a third country or an international organization only if appropriate safeguards are implemented in accordance with the GDPR. You may obtain information regarding such safeguards through the communication channels provided in this Privacy Policy.

In the absence of an adequacy decision by the European Commission or appropriate safeguards, including binding corporate rules, the transfer of personal data to a third country or an international organization shall only be carried out in the following cases:

- The data subject has explicitly consented to the proposed transfer after being informed of the risks associated with such transfer, which arise due to the absence of an adequacy decision by the European Commission and the lack of appropriate safeguards.
- The transfer is necessary for the performance of a contract between the data subject and the data controller, or for the implementation of pre-contractual measures taken at the request of the data subject.
- The transfer is necessary for the conclusion or performance of a contract concluded in the interests of the data subject between the data controller and another natural or legal person.
- The transfer is necessary for reasons of public interest.
- The transfer is necessary for the establishment, exercise, or defence of legal claims.
- The transfer is necessary to protect the vital interests of the data subject or other persons, where the data subject is unable to provide consent.

Links to Other Websites

Our website www.helicopters.ge may contain links to other websites that are not under our control. We are not responsible for the content, privacy practices, or policies of such websites. We recommend that you review the Privacy Policy of each website you visit, where such a policy is available.

Data Security

We implement appropriate technical and organizational security measures to ensure the protection of your personal data. Although we take all necessary steps to safeguard your personal data, we cannot guarantee its absolute security. Therefore, please note that the computer or device you use to access our website should be properly protected against malicious software, malware, and computer viruses. Ensuring the security of your own device and protecting it from such threats remains your responsibility.

To protect your personal data, we implement appropriate organizational and technical measures, including:

a) **Logging** – Through this technical security measure, we record all actions and interactions performed by you within our systems.

b) **Role-Based Access Control** – Access to your personal data is granted only to authorized personnel in accordance with their respective roles and responsibilities.

c) **Data Minimization** – We collect and store only the personal information that is necessary for the provision of our services.

d) **Firewalls** – We use advanced firewall technologies to create a barrier between our internal networks and potential external threats. Firewalls help prevent unauthorized access and cyberattacks.

e) **Incident Response Procedures** – We have established procedures for responding to security incidents.

f) **Regular Security Audits** – We conduct regular security audits and assessments to identify and address vulnerabilities within our systems. These audits help us proactively prevent and mitigate potential security threats.

g) **Employee Cyber Hygiene Training** – We provide our employees with cybersecurity awareness training to improve their knowledge and understanding of cyber hygiene practices.

Your Rights

You have the following rights:

- The right to receive information regarding the processing of your personal data;
- The right to access your personal data and obtain a copy thereof;
- The right to access and request the update and/or completion of your personal data;
- The right to request the deletion or destruction of your personal data.
- The right to request the cessation of the processing of your personal data.
- The right to request the restriction (blocking) of the processing of your personal data.
- The right to withdraw your consent at any time where we process your personal data based on your consent.

To exercise these rights or to obtain more detailed information regarding them, please contact us by phone at: (+995 32) 599 18 70 70, or send us an email at: office@helicopters.ge.

Right to Lodge a Complaint:

In the event that we violate your rights (as a data subject) provided for under the Law of Georgia on Personal Data Protection, or fail to comply with the procedures established by the aforementioned law, you have the right to lodge a complaint with the Personal Data Protection Service or the court.

You have the right to request the Personal Data Protection Service to issue a decision on the blocking of data until a final decision is made regarding the completion of the review of your application.

You have the right to appeal a decision of the Personal Data Protection Service before the court in accordance with the conditions and time limits established by the legislation of Georgia.

Protection of Personal Data of Minors

We do not intentionally collect or store information from individuals under the age of 18. Protecting the personal information of minors is of great importance to us. Therefore, if we become aware that a user is under the age of 18, we will take appropriate measures to delete such user's personal information from our database. By using our website, you hereby confirm that you are at least 18 years old.

Personal Data Retention Period

We retain your personal data throughout the entire period during which services are provided to you. In addition, after the completion of the services, we retain your personal data for a period of 3 years for the following reasons:

- To respond to inquiries and complaints;
- To confirm and ensure fair treatment of you;
- For the purposes of maintaining records and documentation in accordance with the regulations applicable to our activities;
- To fulfill obligations established by applicable legislation.

Changes to the Privacy Policy

From time to time, our Privacy Policy for the website www.helicopters.ge may be updated. We will notify you of any changes to the Privacy Policy by publishing the updated Privacy Policy on this website and updating the "Effective Date" at the top of the Privacy Policy. We monitor any changes in legislation related to personal data protection in the European Union and Georgia.

How to Contact Us

If you have any questions regarding this Privacy Policy, you may contact the administration of our website at: (+995 32) 599 18 70 70. If you do not agree with this Privacy Policy, you will not be able to use the services provided through www.helicopters.ge. In such a case, you should refrain from visiting our website in order to protect your own interests, which are beyond our control.

If you wish to exercise your rights (including the correction, updating, completion, blocking, deletion, destruction, or any other actions related to your personal data), you may contact us via email at: Dpoopiceri@gmail.com.

In addition, regarding matters related to personal data protection, you may contact the Personal Data Protection Officer:

Personal Data Protection Officer: Giorgi Kharaishvili.

You may submit any inquiries or requests related to personal data matters via the following email address: Dpoopiceri@gmail.com.