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1. Purpose

At Dabico Airport Solutions your privacy is important to us, and we are committed to protecting your Personal Data in accordance with applicable data protection laws and this Privacy Policy ("Policy"). Dabico Airport Solutions is comprised of Dabico Airport Solutions, headquartered at Plot No: S10128, Jebel Ali Free Zone, Post Box: 61124, Dubai and all its EEA and UK subsidiaries and affiliates (also referred to below as "Dabico", "DAS", "Dabico Airport Solutions", "we", "us" and "our").

2. Scope

This Policy applies to those companies of the Dabico who have posted this Policy on their websites. All Dabico sites to which this Policy is applicable are collectively referred to as this "Site".

3. Background

This Policy outlines our data processing practices, where we Process Personal Data gathered from and about Site visitors, our customers, vendors and suppliers.

4. Policy

If you reside in the EEA, the UK or Switzerland, or where EEA, UK or Swiss data protection laws apply, please see Section 4.5 for additional information.

4.1. Personal Data we collect and from where

4.1.1. Personal Data we collect directly from you

We collect the following categories of Personal Data through the Site and in communications we receive from you:

- Personal Details, such as name, contact details including telephone number, e-mail address or mailing address;
- Business Information, such as company name, its market, your job title, role and department in the company, your company's order or serial/PO number; and
- Inquiries, requests and other communications with you, the products of interests you indicated, the type and category of subjects you raise with us, and our responses

4.1.2. Personal Data we collect from your devices

When you browse our Site, we may collect technical information about you and your device through technology such as "cookies". Such information includes for instance your IP address. For further details in this respect, please see our separate Cookie Policy available on the Site.

4.1.3. Personal Data that Dabico Processes

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The Dabico companies collect Personal Data from other companies within the Dabico group of companies when you make inquiries regarding our products and services, but those inquiries are more appropriately handled by another company within the Dabico companies.

4.1.4. Personal Data from third parties

Finally, we receive the categories of Personal Data listed in Section 4.1.1. above from third parties who provide services to us, in particular search engine optimization services, hosting services, social media services, web mastering services, customer management platforms, as well as from our business partners and customers.

We may also combine the Personal Data that we collect directly from you with information that we receive from such third parties, including those that are acting on our behalf, for the purposes set out in Section 4.2.

4.2. How we use your Personal Data

We generally Process your Personal Data for the purposes of administering our Site, responding to your inquiries, fulfilling your requests or managing interactive customer programs, as well as for direct marketing. More specifically, we may Process your Personal Data to:

4.2.1. Manage your company's orders

This includes Processing Personal Data to be able to manage order and provide the company you represent with our products and services.

4.2.2. Respond

This includes Processing Personal Data to Process and respond to your inquiries, fulfil your requests, to respond to your communications, and manage interactive customer programs.

4.2.3. Direct

This includes Processing Personal Data to contact you as the representative of the company with special offers and promotions and inform the company you represent about our new products and services.

4.2.4. Ensure Network and Information Security

This includes Processing Personal Data to ensure network and information security, provide technical support for the Site, maintain internal records about relevant incidents and other security related information.²

4.2.5. Legal, Regulatory, Compliance Requirements and Legal Claims

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This includes Processing Personal Data to conform to legal requirements and industry standards, comply with legal process, detect and prevent fraud and misuse, establish, exercise and defend our legal rights or claims, and protect others.

4.2.6. Corporate Transactions

This includes Processing Personal Data to comply with requests of prospective or actual purchasers interested in a member of the Dabico Companies or its equity or assets, or in relation to a purchase of equity or assets by us.

4.3. Sharing your Personal Data

We share your Personal Data with the categories of recipients described below. In some cases, the entities below collect Personal Data directly from you on our behalf.

We share your Personal Data with our subsidiaries and affiliates, successors or assigns for all purposes listed in Section 4.2 above.

We share your Personal Data with third party service providers, such as providers of marketing services, customer management platforms, hosting services, IT providers and IT support), as necessary to fulfil the purposes listed in Section 4.2 above. When we share Personal Data with them, we ensure that providers are bound by law and/or by contract to protect the confidentiality and security of Personal Data, and to only use Personal Data to provide requested services to us, in accordance with applicable laws.

We share your Personal Data with other companies, vendors and business partners, which perform certain functions for us, whereby these companies are themselves responsible to determine the purposes and/or means of the processing of Personal Data and for the lawfulness of the Processing, in particular: third party payment processors, banks, financial institutions and credit card companies.

Where the law requires us to obtain your prior opt-in consent, we will seek such consent before sharing your contact information with our business partners, to provide you with notices about developments, products and services that may be of interest to the company you represent.

We may disclose Personal Data to prospective or current purchasers of any interest in Dabico or its assets, or in relation to a purchase of companies or assets by Dabico.

We may be required to disclose Personal Data to courts, opposing or related parties to the legal proceedings, in response to a court order or other legal process, or as otherwise required by law. We may also share such data with courts or in the legal proceedings when we defend or enforce our rights, protect our property, assets or safety of others.

4.4. Retention of your Personal Data

We will keep your Personal Data for as long as is reasonably necessary for us to fulfil the purposes for which

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Personal Data is collected as stated herein and otherwise in compliance with applicable laws. We retain Personal Data in accordance with our internal retention guidelines, which are based on criteria that include legally mandated retention periods, operational directives or needs, and pending or potential litigation. Please contact us for further details on applicable retention periods.

4.5. Information for Individuals Residing in the EEA, the UK, Switzerland or where GDPR is Applicable

We will keep your Personal Data for as long as is reasonably necessary for us to fulfil the purposes for which Personal Data is collected as stated herein and otherwise in compliance with applicable laws. We retain Personal Data in accordance with our internal retention guidelines, which are based on criteria that include legally mandated retention periods, operational directives or needs, and pending or potential litigation. Please contact us for further details on applicable retention periods.

4.5.1. Legal Bases for Processing

Depending on the purpose of each processing described in Section 4.2 above, the Processing of your Personal Data is justified on one of the legal bases indicated below:

- your consent (which we will seek separately, if required), such as to send you direct marketing communications, unless an exception to consent applies under applicable EEA, UK or Swiss laws, and to share your Personal Data with third parties for the same purpose (e.g. the purpose in point 4.2.3 above);
- the necessity for fulfilling a contract with you, or for taking steps, at your request, to enter into such a contract;
- the necessity for compliance with a legal or statutory obligation to which we are subject (e.g. for the relevant purposes listed in points 4.2.5 above); or
- our legitimate interests (such as e.g. those outlined in points 4.2.2 or 4.2.4 above).

4.5.2. Your EEA, UK or Swiss Privacy Rights

You may exercise the following privacy rights regarding your Personal Data, if you reside in the EEA, the UK or Switzerland, or where the GDPR, or other applicable EEA, UK or Swiss data protection laws so provide, whereby these rights are subject to the conditions laid down therein.

- Access – You have the right to obtain from us confirmation if your Personal Data is being Processed, certain information in this regard and a copy of the Personal Data undergoing said Processing.
- Rectification – You have the right to request that inaccurate Personal Data be corrected and to have incomplete data completed.

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- **Objection** – You have the right, when we Process your Personal Data based on our or a third party’s legitimate interests, to object to the Processing of your Personal Data for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide for that Processing. In addition, you have the right to object at any time where your Personal Data is Processed for direct marketing purposes. (Please note that even if you object to the use of your Personal Data for direct marketing purposes, we will still send your company transactional messages in relation to services that you have purchased from us on behalf of the company. These include responses to your questions and information about products and services you have purchased from us on behalf of the company.)
- **Portability** – You have the right to receive a copy of the Personal Data that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to transmit them to other data controllers. This right only exists if the Processing is based on your consent, or a contract and the Processing is carried out by automated means.
- **Restriction** – You may request that we restrict Processing of your Personal Data if (i) you contest the accuracy of it – for a period we need to verify your request; (ii) the Processing is unlawful and you oppose the erasure of it and request restriction instead; (iii) we no longer need it, but you tell us you need it to establish, exercise or defend a legal claim; or (iv) you object to Processing based on public or legitimate interest – for a period we need to verify your request.
- **Erasure** – You may request that we erase your Personal Data if it is no longer necessary for the purposes for which we have collected it, if you have withdrawn your consent and no other legal ground for the Processing exists; if the Processing is unlawful, or if erasure is required to comply with a legal obligation.
- **Right to lodge a complaint** – You also have the right to lodge a complaint with a Supervisory Authority, in particular in the country of your residence in the EEA, the UK or Switzerland, or the location where the issue that is the subject of the complaint occurred.
- **Right to refuse or withdraw consent** – Please note that in case we ask for your consent to certain Processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any Processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

If you wish to exercise any of the above rights, please see Section 4.7 below on how to contact us.

4.5.3. International Transfers of Your Personal Data

Due to the global nature of our operations, we may transfer Personal Data covered by this Privacy Policy within the Dabico companies, which are based in ‘third countries’, i.e., countries outside of

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the EEA, the UK, and Switzerland, which are not deemed to offer an adequate level of data protection. In such situations, Dabico will enter into an intragroup transfer agreement to adduce appropriate safeguards, including where necessary, the Standard Contractual Clauses for data transfers adopted by the European Commission or an appropriate body in the UK, in accordance with applicable data protection laws.

Transfers of Personal Data to external third parties located in third countries outside the EEA, the UK or Switzerland that do not provide the same level of protection to your Personal Data, take place using an acceptable data transfer mechanism, such as the EU Standard

Contractual Clauses (see [here](#)), Binding Corporate Rules (see [here](#)), approved Codes of Conduct and Certifications or, in exceptional circumstances, on the basis of permissible statutory derogations.

If you wish to receive further information or, where available, a copy of the relevant data transfer mechanism, you may contact us, as explained in Section 4.7 below.

4.6. Links to Other Sites

Our Site may include links to the websites of our business partners, vendors and advertisers. Such third-party websites operate according to their own terms of use and privacy policies and we have no control over such websites. More specifically, we do not endorse and are not responsible or liable for any content, advertising, products or other materials on or available from such sites.

4.7. How to Contact Us

If you have questions or comments regarding this Privacy Policy, or you would like to exercise your privacy rights, if applicable, you can contact us at the following address: dpo@dabico.com or by notifying us in writing at our address:

Attn: DPO
 Dabico Airport Solutions
 Plot No: S10128,
 Jebel Ali Free Zone,
 Post Box: 61124, Dubai

You may also notify us in writing at the address of our representative in the EU:

Attn: DPO
 Dabico Airport Solutions Germany GmbH
 Gottlieb-Daimler-Straße 7
 63128 Dietzenbach, Germany

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4.8. Changes to this Privacy Policy

We may change or modify this Privacy Policy at any time to reflect the kind of Processing activities that we may carry out. We will post the modified Privacy Policy on the Site. The changes will be effective as of the date indicated therein.

4.9. Glossary

The following terms are used within this Privacy Policy and mean the following:

“Affiliates” means any entity, which is partially or wholly controlled by, controls or is in common control with the respective entity.

“Controller” means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Data.

“EU” means the European Union.

“EEA” means the European Economic Area and comprises the EU Member States as well as Norway, Iceland and Liechtenstein.

“GDPR” means the EU General Data Protection Regulation and any legislation equivalent to the GDPR in the EEA, United Kingdom or Switzerland.

“Personal Data” means any information relating to an identified or identifiable natural person (i.e. “data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

“Processing” or “Process” means any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

“Processor” means a natural or legal person, public authority, agency or any other body which Processes Personal Data on behalf of the Controller.

“Subsidiary” means an entity that is partially or wholly owned by another entity.

“Supervisory Authority” means an EEA, UK or Swiss data protection authority.



Website Privacy Notice (GDPR)

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Rev	Reason for Change	Description of Change	Date	Author
01	Initial draft of policy	Create	04/25/2021	Greg Ballou

Approved by Name	Title	Date
Greg Ballou	CIO	01MAY2022