

This Privacy Policy is designed to help you understand the information we (Paraflight Aviation dba “Urgentflights.com” herein as “we” “us” Urgentflights.com” or “Urgentflights”) may collect and how we secure that information. Understanding this privacy policy may change with or without notice in the future. You can always see what privacy policy is currently in effect by clicking on the link that brought you to this page.

1. WHAT INFORMATION DO WE COLLECT?

When you visit the website, you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis and website use information collected on an aggregate basis as you and others browse the site.

2. PERSONAL INFORMATION

Registration Information: You will provide us with information about yourself, your firm or company, and your practices when you purchase our products and services, register for forum support or register for email newsletters and alerts.

Email Information: If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses.

Statistical Information: We collect statistical usage information while you are on our websites. That may include behavior as to what information is accessed, as well as other usage information. We utilize third-party web-analytic providers who have the capability to cross-reference your activities on our site, with activities on other websites, and as a result, we may obtain information pertaining to your demographic or psychographic profile.

3. WEBSITE USE INFORMATION

Like other commercial websites, this site utilizes a standard technology called “cookies” (see explanation below, “What Are Cookies?”) and Web server logs to collect information about how this site is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at this site, and the websites visited just before and just after our site. We, our advertisers, and ad serving companies may also use small technology or pieces of code to determine which advertisements and promotions users have seen and how users responded to them.

What Are Cookies?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site’s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser’s preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Some of our business partners (e.g., advertisers and analytics

tracking services) use cookies that originate from their sites. We have no access or control to those cookies.

How Do We Use Information We Collect from Cookies?

As you use this website, the site uses its cookies to differentiate you from other users. In some cases, we also use cookies to prevent you from seeing unnecessary advertisements or requiring you to log in more than is necessary for security. Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting this site and which parts of the site are most popular, as well as control content or offers shown to you. This helps us gather feedback to constantly improve this site and better serve our customers. Cookies do not allow us to gather any personal information about you and we do not store any personal information that you provided to us in your cookies.

4. HOW DO WE USE THE INFORMATION

Broadly speaking, we use personal information for the purposes of administering and expanding our business activities, providing customer service and making available other products and services to our customers and prospective customers. Occasionally, we may also use the information we collect to notify you about important changes to this website, new services, and special offers we think you will find valuable. You may notify us of your desire not to receive these offers by clicking the unsubscribe link contained in each such email.

Sharing Information with Third Parties

The information we collect is used to improve the content of this site and the quality of our service and is not shared with or sold to other organizations for commercial purposes. Your information could be shared under the following circumstances:

We use third parties to facilitate our business, including, but not limited to, sending email, validating login information, and processing payments. In connection with these offerings and business operations, these third parties may have access to your personal information for use in connection with those business activities. We make reasonable efforts to ensure that the sharing of this information occurs in a secure manner, but we cannot guarantee that information remains secure.

As we develop our business, we may buy or sell assets or business offerings. Customer, email, and visitor information are generally one of the transferred business assets in these types of transactions. However, understand that we will notify you in such a case whereas we sell our business and transfer as a result, your information as part of that business. It is not our normal process to sell the information we collect. Assets that we may acquire will be subject to our terms and privacy policy, regardless of the conditions they may have agreed to in prior agreements.

We may also transfer such information during corporate divestitures, mergers, or any dissolution.

If it becomes necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law. You should not have an expectation of privacy with respect to a potential inquiry by law enforcement, as that concept is understood under US law.

Notice of New Services and Changes

Occasionally, we may also use the information we collect to notify you about important changes to this website, new services, and special offers we think you will find valuable. As our customer, you will be given the opportunity to notify us of your desire not to receive these offers by clicking the unsubscribe link contained in each such email.

5. HOW DO WE SECURE THE INFORMATION

Generally, the internet is not a secure communication medium. However, we do take reasonable and appropriate steps to safeguard information provided to us. Generally, people communicate with us in two ways – via email (including website forms) and secure areas of our website.

Email & Form Communications

Email is not generally recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. This includes all contact forms on our website, which use protocols to package and send your message as regular electronic mail. You will never receive from us a communication asking you to reply via email with financial information. If you receive an email purporting to be from us requesting financial or other sensitive information – please contact us.

Secured Socket Layering

Some of the information you may enter on this site (such as when ordering products or subscriptions) may be transmitted securely via Secure Sockets Layer SSL-encryption services. SSL (Secure Sockets Layer) is the standard security technology for establishing an encrypted link between a web server and a browser. The purpose of an SSL connection is to ensure that all data passed between the web server and browsers remain private and integral. SSL is an industry standard and is used by millions of websites in the protection of their online transactions with their customers. Pages utilizing this technology will have URLs that start with HTTPS instead of HTTP. Please note that the SSL-encryption is generally recognized to provide good security in most circumstances, but we do not warrant that information transmitted this way cannot be discovered or disclosed to third parties.

Financial Information

All transactions involving the transfer of financial information on our website (excluding voluntarily provided information via email which we do not authorize) is completed using secured transaction portals and protocols. All financial transactions pages occur with SSL-

encryption as described above. Our credit processors use additional encryption and generally accepted financial industry standards, to protect such information, from disclosure.

Note that financial information is not kept on our website servers. In order to protect information regarding payments, financial information is stored according to the requirements of our credit card processors and is secured by their technology, consistent with financial industry standards. This is generally known as PCI compliance.

Consistent with state and federal legal requirements, we will notify our users in a timely manner any breaches of security that we become aware of through our financial partners, and you authorize us without further prior notice to empower our affiliates to take all reasonable steps necessary to secure and safeguard personal or financial information in the event of a breach, as well as revealing information as required to law enforcement investigating such breaches.

What About Other Websites Linked to This Site?

We are not responsible for the practices employed by websites linked to or from our site nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our site. Please remember that when you use a link to go from our site to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including sites which have a link on our site, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

6. VOLUNTARY DISCLOSURE & NO EXPECTATION OF PRIVACY

You are given notice that you do not, and should not, have a reasonable expectation of privacy regarding any information transmitted or stored on our systems or by those of our affiliates, consistent with how the phrase "expectation of privacy" is understood in the context of U.S. law (state or federal – as may be applicable). We explicitly notify you that we may disclose any information you've provided us if required to do so by law, or if in our sole judgment, we believe that such action is necessary and/or reasonable to (a) conform to the law or comply with legal process served on us or affiliated parties; (b) protect and defend our rights and property, our site, the users of our site, and/or our affiliated parties; (c) act under circumstances to protect the safety of users of our site, us, or third parties.

In accordance with our terms of service, you agree to hold us harmless, and we disclaim specifically any liability in connection with such disclosures.

7. YOUR CONSENT

By using this site, you consent to our collection and use of your personal information as described in this Privacy Policy. If we change our privacy policies and procedures, we will post those changes on this site to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

8. NOTICE FOR RESIDENTS OF CALIFORNIA

This section supplements the information in our privacy policy and applies solely to visitors, users, and others who are residents of the State of California, as defined in Section 17014 of Title 18 of the California Code of Regulations. This section is effective as of January 2020 to comply with the [California Consumer Privacy Act of 2018](#) (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this section.

Category	Collected	Details	Source
Identifiers	Yes	Device IP address, email address, cookie string data, pseudonymous data (e.g. hashed emails), operating system, and (in the case of mobile devices) your device type, and mobile device's identifier (such as the Apple IDFA or Android Advertising ID) and any other unique identifier that may be assigned to any device by third parties and cross-referenced to recognize a device.	Directly and indirectly from consumers, third party data providers and Advertising Partners. In the case of business email addresses, RollWorks B2B Services may infer a business email address.
Personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Yes	In respect to our B2B Services: Name, business address, business telephone number, education, employment and employment history.	Directly from third party data providers.
Protected classification characteristics under California or federal law	Yes	Limited to age ranges such as 35-44, 45-54, 55-64 and 65+ and male/female gender categories are sometimes collected for advertising our services that do not carry a risk of unintended discrimination.	From third party data providers.
Commercial information	Yes	Records of products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.	Directly from consumers and Advertiser.
Biometric information	No	Not Applicable	Not Applicable

Internet or other similar network activity	Yes	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Directly from cookie browsing history on Advertisers' Digital Properties. Non-personal information about one of our ads e.g. the third party who served the ad, and the name of the ad) may be connected with browsing history or activity on our websites for the purposes of determining attribution information (e.g. whether particular ad led to a consumer visiting our website, and, if so, which particular ad campaign).
Geolocation data	Yes	Non-precise geolocation derived from IP address.	Directly from consumers and Advertising Partners.
Sensory data	No	Not Applicable	Not Applicable
Professional or employment-related information	Yes	Current or past job history, including details about the employer (industry, name, company location, company domain or URL), and employee (positions held, duration of employment, and office location of the company where the employee worked).	Third party data providers.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R Part 99))	No.	Not Applicable	Not Applicable
Inferences drawn from other personal information	Yes	Creating profiles that reflect consumer preferences and interests.	Third party data providers.

Information We Collect and the Purposes for Which this Information is Used

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). This collection of information is listed in our cookies and privacy policies as to what data is collected.

Listed above is the information and the CCPA categories of personal information we have collected from users of our website within the last twelve (12) months in respect of our Services. Please note that personal information in certain categories may overlap with other categories.

For clarity, under CCPA personal information does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; and
- Information excluded from the CCPA’s scope such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Purposes for Which Personal Information is Collected

All data we collect is for the business purpose of providing services primarily for our marketing, advertising, or analytical Services. However, as part of performing these Services, we also use data collected (as identified above) for the following additional business purposes:

- Auditing Interactions with Consumers
- Debugging and Repair
- Security: detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities;
- Internal Research and Development: conduct internal research for technological development of our Services and demonstration of the performance of these Services; and
- Quality and Safety Maintenance and Verification

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose, however, we do not sell, rent, or share your information with others, except in the course of our own business needs (for example, we share analytical data with our advertising platforms to show ads on our behalf, but that information does not disclose personally identifiable information to those third party vendors).

Disclosure of Personal Information for a Business Purpose

ParaFlight Aviation (Urgentflights.com) does not sell the data we collect, but instead, discloses personal data for business purposes, primarily to perform its advertising, marketing and analytical Services.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes the rights of California residents under CCPA and provides information on how to exercise those rights.

Right to Know and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (otherwise known as a data portability request); and
- Two separate lists where we have sold or disclosed your personal information for a business purpose:
 - Sales: identifying the personal information categories that each category of recipient purchased; and
 - Disclosures for a business purpose: identifying the personal information categories that each category of recipient obtained

Right to Delete

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our services providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relations with you or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for such activities;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights or exercise another right provided by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Right to Know, Data Portability and Right to Deletion

To exercise the access, data portability, and deletion rights described above, please submit verifiable consumer request to us by either:

privacy@urgentflights.com

or

844-538-1911

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable request for access of data portability twice within a 12-month period. The verifiable consumer request must:

Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and

Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot: (i) verify your identity or authority to make the request; and (ii) confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will deliver our written response to you electronically unless you indicate delivery to be by mail.

Any disclosures we provide to you will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot complete a request, if applicable.

The format of our responses to you concerning personal information collected, disclosed or sold will be provided in a readily useable format that should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out Rights

To exercise the right to opt-out of our sale of your Contact Data or to opt out of interest-based advertising, you (or your authorized representative) may submit a request to us by email (privacy@urgentflights.com)

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by CCPA that can result in different prices, rates or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.