

Privacy Policy

Effective Date: 1st November 2022.

Your privacy is important to us. It is Eagle's Flight's policy to respect your privacy regarding any information we may collect while operating the application. Accordingly, we have developed this privacy policy for you to understand how we collect, use, communicate, disclose and otherwise make use of personal information. We have outlined our privacy policy below.

- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use personal information solely for fulfilling those purposes specified by us and for other ancillary purposes, unless we obtain the consent of the individual concerned or as required by law.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up to date.
- We will protect personal information by using reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

- We will make readily available to customers information about our policies and practices relating to the management of personal information.
- We will only retain personal information for as long as necessary for the fulfilment of those purposes.

We are committed to conducting our business in accordance with these principles to ensure that the confidentiality of personal information is protected and maintained. Eagle's Flight may change this privacy policy from time to time at Eagle's Flight's sole discretion.

Information Collected by Eagle's Flight applications -

When the URVU app is installed on your phone, a list of permissions appears and are needed for the app to function effectively. There is no option to customize the list. The permissions that Eagle's Flight requires and the data that shall be accessed and its use is as below:

1. Device & URVU App History: We need your device permission to get information about your device, like OS (operating system) name, OS version, mobile network, hardware model, unique device identifier, preferred language, etc. Basis these inputs, we intend to optimize your overall app experience, use OS specific capabilities to drive great in-funnel experiences using components of device OS, etc.

2. Contacts: If you allow us to access your contacts, it enables us to provide you a feature, where you can easily send across referral links to your friends to invite them to Eagle's Flight's URVU app. Access to contacts only at the point of distributing invites, no contact information is stored.

3. Personal Information: Your name and email will be kept for records to act as an identifier for your feedback. Additionally, feedback submitted to you will be kept for your review.

4. Your personal data will be kept during the period of subscription. You may delete your data before ceasing subscription or it will be deleted automatically after a six-month period after ceasing the subscription.

5. After a period of six months after ceasing subscription, feedback provided or received will be anonymized for the purpose of aggregate analysis.

6. The data is stored on a server located within the European Union.

Your Rights: Pursuant to the GDPR, you have the following rights in relation to your Personal Data, under certain circumstances and subject to any applicable exceptions:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data along with certain other details. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your Personal Data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data, such as where you withdraw your consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data with so you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it (please read below for information on your right to object). We will tell you before we lift any restriction on processing. If we shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to data portability:** You have the right to obtain your Personal Data from us that you consented to give us or that was provided to us as necessary in connection with

our contract with you, and that is processed by automated means. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- **Rights in relation to automated decision-making:** You have the right to be free from decisions based solely on automated processing of your Personal Data (including profiling) which produce a significant legal effect on you, unless this is necessary in relation to a contract between you and us or you provide your explicit consent to this use.
- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so:
 - If we are relying on a legitimate interest to process your Personal Data -- unless we demonstrate compelling legitimate grounds for the processing or we need to process your data in order to establish, exercise, or defend legal claims;
 - If we are processing your Personal Data for direct marketing. We may keep minimum information about you in a suppression list in order to ensure your choices are respected in the future and to comply with data protection laws (such processing is necessary for our and your legitimate interest in pursuing the purposes described above);
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect any processing of your data before we received notice that you wished to withdraw consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your Personal

Data, you can report it to the data protection authority that is authorized to hear those concerns

Contact us at Dataprotection@eaglesflight.com if you have any questions regarding this privacy policy.