



# Avy – Privacy Policy

Version April 2020

Our Privacy Policy explains:

- What information we collect, why and how
- Our legal basis
- How we store, use and share that information
- The choices we offer, including how to access and update information
- How you can make a complaint if you are concerned about your privacy

This Privacy Policy applies to information that Avy B.V. collects when you use our websites, and other products and services that link to this Privacy Policy (collectively known as the "Services").

Through this data protection declaration, we would like to inform you on the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, we inform you of your rights, by means of, this data protection declaration.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Avy B.V.

## 1. Data collection and use

We collect information to provide better services to all our users. We collect information in the following ways:

- The information provided to us: we collect the information you directly provide to us. For example, information is collected when you participate in any interactive features of the Services; filling out a form, providing feedback, requesting customer support, or otherwise communicating with us.
- The types of information we may collect include your name, e-mail address, phone number and any other information you choose to provide.
- Cookies that may uniquely identify your browser.
- Location information: when you use our services, we may collect and process information about your actual location, the location of the Avy wing drone, the location of your order, and the delivery location. We use various technologies to determine location, including IP address, GNSS (incl. GPS), and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers.
- Cookies: we use cookies to collect and store information from when you visit our website. For more detailed information please check paragraph 6.
- Images: our Avy wing drones use a FPV (First Person View) camera to confirm terrain data for safety purposes. The camera on the Aircraft may



incidentally capture overhead images of people. To ensure full data protection, we don't store these images.

### **How we use collected information**

We use the information we collect to provide, maintain, protect, promote and improve our Services, to develop new ones, and to protect Avy B.V. and our users. We may use this information to help us solve any issues you might be facing with the Avy services.

We also use the information collected to improve your user experience and the overall quality and safety of our services, to improve navigation and to inform you on the development of our new features or services.

We may also use the information we collect to:

- Comply with any applicable law, regulation, legal process or enforceable governmental request.
- Enforce applicable terms of service, including investigation of potential violations.
- Detect, investigate, prevent, or otherwise address safety, fraud, security or technical issues.
- Protect against threats to the rights, property or safety of Avy, our users or the public as required or permitted by law.

## **2. Legal basis for processing personal information**

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject will always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Avy B.V.

Data protection laws vary among countries, with some providing more protection than others. The laws of some countries may provide a lower standard of protection than under the laws of your country. The GDPR is globally considered as one of the most advanced privacy protection forms of legislation.

To process your personal data, we rely on the following legal basis, under EU data protection law:

Where we have obtained your consent, for example to action a request from you or respond to your specific query. You can withdraw your consent at any time, but we may still need to retain a record of your correspondence with us.

For the purposes of our legitimate interests, when necessary, such as for the following

- Providing, maintaining, and protecting our services to meet the needs of our users
- Developing new products and features



- Detecting, preventing, and helping to address fraud, abuse, security, safety and technical issues with our service
- Protecting against threats to the rights, property or safety of Avy, our users or the public as required or permitted by law
- Performing research that improves our services for our users and benefits the public
- Enforcing legal claims, including investigation of potential violations of applicable Terms of Service

To comply with a legal obligation when necessary, for example under anti-money laundering or anti-bribery legislation.

In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another person of interest. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be provided to a doctor, hospital or other third party. In the case of theft from our office and workshop, we'll hand over the footage shot by our security cameras to the police.

### **3. Accessing and updating personal information**

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how you interact with our Services.

Whenever you use our services, we aim to provide you with access to your personal information. If that information is incorrect, we strive to give you efficient ways to update it whenever you want. Alternatively, you may choose to delete it – unless we have to keep that information for legitimate business or legal purposes. Since EU data protection law applies to our way of processing your personal information, you also have the right to object to the processing of your information or export your information to another service at any time.

We aim to maintain our services in a way that protects information from accidental or malicious destruction. Due to this, once you delete information from our services, we may not be able to delete residual copies from our active servers and remove information from our backup systems immediately.

You may request access to the information we hold about you, or request correction of that information by sending a written request to [hello@avy.eu](mailto:hello@avy.eu).

### **4. Information storage & security**

For legitimate business or legal purposes, we retain personal information for as long as necessary. Sometimes business or legal requirements oblige us to retain certain information for extended periods of time. Reasons we might retain some data for longer periods of time include:

- Security, safety, fraud & abuse prevention, detection and resolution



- Financial records for bookkeeping purposes
- Complying with legal or regulatory requirements
- Ensuring continuity and safety of our services
- If you communicate directly with Avy

Avy shall only process and store the personal data of the data subject, for the necessary period needed to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which Avy is subject to.

### **Security**

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or when another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

We work hard to protect Avy and our users from unauthorized access to, or unauthorized alteration, disclosure or destruction of the information we hold. More specifically:

We encrypt many of our services using SSL.

We frequently review our data collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

Restricted access to personal information is given to Avy employees, contractors and agents who need to know that information in order to process it for us. They are subject to strict contractual confidentiality obligations, and may be disciplined or terminated if they fail to meet these obligations.

In case third parties need access to data, we'll conclude a contract to make sure they only use it for the intended goal (except (investigating) authorities). Third parties are mainly established in the Netherlands or the EU. A number of service providers are established within the US, including, but not limited to: Google, Facebook, Hubspot.

## **5. Information we share**

We do not share personal information with companies, organizations and individuals outside of Avy, unless one of the following circumstances applies:

- With your consent: we'll share personal information with companies, organizations or individuals outside of Avy when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.
- To a partner company: Avy may share personal information with its highly secured contracted affiliates.



- For external processing: we provide personal information to our affiliates or other trusted businesses and persons that process it for us based on strict guidelines, in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- For legal reasons: we'll share personal information with companies, organizations or individuals outside of Avy if we genuinely assume that access, use, preservation or disclosure of the information is reasonably necessary to:
  - Comply with any applicable law, regulation, legal process or enforceable governmental request.
  - Enforce applicable terms of service, including investigation of potential violations.
  - Detect, prevent, or otherwise address fraud, security or technical issues.
  - Protect against threats to the rights, property or safety of Avy, our users or the public as required or permitted by law.
  - Obtain legal advice.

We may share non-personally identifiable information publicly and with our partners. For example, we may publicly share this information to show trends about the general use of our services, or we may share Avy aircraft location data for the purpose of unmanned traffic management services. The data will always be anonymised and can never be traced on a personal level.

We may share your personal information in connection with a merger, acquisition, or sale of Avy's assets. We will take reasonable steps to ensure that your personal information continues to be subject to the same protections set out in this Privacy Policy.

## **6. Cookies**

A lot of the information named in this policy is gathered through the use of cookies. Cookies are text files stored by your browser when visiting our website. If you visit our website, your browser will be recognized. We also use comparable techniques like tracking pixels and Javascript. We use these data to improve the user experience of our website or to let third parties serve you personalized ads. We always ask for your permission when necessary.

## **7. When this Privacy Policy applies**

Our Privacy Policy applies to information collected by Avy in relation to the Services. Our Privacy Policy does not apply to services or products offered by other companies or individuals, including companies you may have transacted with through our services.



## **8. Compliance, complaints and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. We also adhere to several self regulatory frameworks.

If you wish to make a complaint about how we have handled your personal information, you may do so by writing to [hello@avy.eu](mailto:hello@avy.eu). When we receive formal written complaints, we will contact the person who made the complaint and follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## **9. Changes**

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services, otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

## **10. Contact**

If you have any questions about this Privacy Policy or any requests concerning your personal information, please contact us at [hello@avy.eu](mailto:hello@avy.eu).