

# U.S. Consumer Privacy Notice

Effective Date – February 28<sup>th</sup>, 2024

## About Us

National Air Cargo Inc., National Airlines and its subsidiaries (“National”, “Company”, or “we”) is an airline and transportation logistics company operating on-demand cargo and passenger charter services. We process personal information in different context, and we do so by fully respecting your privacy, rights and freedoms in our commitment to ethical and responsible business practices.

## Overview

This U.S. Consumer Privacy Notice (“Consumer Privacy Notice”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) and Virginia Consumer Data Protection Act (“VCDPA”). This Consumer Privacy Notice also applies to you as an individual interacting with National as defined in other applicable U.S. data privacy laws including the Colorado Privacy Act (CPA) and the Connecticut Data Privacy Act (CTDPA) and as a supplement to National Air Cargo’s Inc. (“NAC”) other privacy notice [here](#).

This Consumer Privacy Notice covers the collection, use, disclosure, and sale of Consumers’ personal information as defined by applicable U.S. data privacy laws as stated above except to the extent such personal information is exempt from the notice obligations of those regulations. Per the CCPA and VCDPA, and for purposes of this Consumer Privacy Notice, personal information (“PI”) is defined as information that identifies, relates to, describes, can reasonably be associated with, or could reasonably be linked, directly or indirectly, with you or your household. This Consumer Privacy Notice also covers rights U.S. consumers have under the regulations. The description of our data practices in this Consumer Privacy Notice, as required by the regulations, covers only the prior calendar year and will be updated annually. Our data practices may change, and if our practices become materially different, we will provide notice as applicable in connection with the collection, including references to other applicable privacy policies and notices.

In the event of a conflict between any other National policy, statement or notice and this Consumer Privacy Notice, this Consumer Privacy Notice will prevail for Consumers of California and Virginia and other applicable U.S. regulations and their rights under those regulations, respectively. Please see our other Privacy Notice posted or referenced on our websites including, without limitation, [Privacy Policy](#).

This Consumer Privacy Notice applies to interactions you may have with National in your individual capacity or in your capacity as an employee, owner, director, officer or independent contractor of another company, partnership, sole proprietorship, non-profit, or government agency (collectively, “Entity”).

## Types of Personal Information we Collect and Use

We collect and share categories of personal information (“PI”) from the following sources and for the following purposes depending on your interaction with us:

Category of Personal Information	Examples	Sources of Personal Information	Purposes for Personal Information Collection, Use and Disclosure	Categories of Third Parties Who May Receive Each Category of Personal Information
<b>1. Identifiers</b> (as defined in CCPA §1798.140(o)(1)(A))	This may include but is not limited to: Full Name, Home Address, Online Identifier, Personal Email, Postal Address, Previous Residence Address, Work Email, Phone Numbers, Social Security Number, Unique Personal Identifier or other similar identifiers.	Directly from consumers through website or online submissions and through quote requests either online or by contact us by phone.  Directly from our Service or Business Partners to provide you information requested or process requested transaction.	To provide you requested information or provide you a quote.  To conduct relevant day to day business operations such as freight management and cargo shipments and adhere to applicable compliance laws.  To market new and existing services as applicable.  For customer support, customer surveys, and relationship management.	Service Providers, External Agencies, External Auditors and Regulators and Public Authorities / Government as required.
<b>2. Personal Information Records</b> (as defined in CCPA §1798.140(o)(1)(B))	This may include information such as: Contact Details, Date of Birth, Health Data or Insurance Policy Information.	Directly from consumers through website or online submissions and through quote requests either online or by contact us by phone.  Directly from our Service or Business Partners to provide you information requested or process requested transaction.	To provide you requested information or provide you a quote.  To conduct relevant day to day business operations such as freight management and cargo shipments and adhere to applicable compliance laws.  To market new and existing services as applicable.  For customer support, customer surveys, and relationship management.	Service Providers, External Agencies, External Auditors and Regulators and Public Authorities / Government as required.
<b>3. Protected Classification Information</b> (as defined in CCPA §1798.140(o)(1)(C))	This may include, but is not limited to: Age, Race or Ethnicity, Gender, Disability or Specific Conditions.	Directly from job applicants and employees for recruitment and employment purposes.	To process job applications and recruitment processes.  To provide benefits and payroll and other employment services to our employees	Service Providers, and Regulators and Public Authorities / Government as required.

<b>4. Commercial Information</b> (as defined in CCPA §1798.140(o)(1)(D))	This may include, but is not limited to: Records of Products or Services Purchased.	Directly from Consumers to process business transactions including freight management and cargo shipments and for customer relationship management.	For customer support and relationship management including freight management and cargo shipments.  To conduct relevant day to day business operations and adhere to applicable compliance laws.	Service Providers and Regulators and Public Authorities / Government as required.
<b>5. Internet or other similar network activity</b> (as defined in CCPA §1798.140(o)(1)(F))	This may include, but is not limited to: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Directly from consumers through cookies and other tracking technologies while browsing the website.	To track website usage.  To optimize our marketing efforts and provide you with targeting advertising.	Service Providers and Third Party Advertisers
<b>6. Geolocation data</b> (as defined in CCPA §1798.140(o)(1)(G))	This may include, but is not limited to: IP address	Directly from consumers through cookies and other tracking technologies while browsing the website.	To track website usage.  To optimize our marketing efforts and provide you with targeting advertising.	Service Providers and Third Party Advertisers
<b>7. Professional or Employment Information</b> (as defined in CCPA §1798.140(o)(1)(I))	This may include, but is not limited to: Professional, educational or employment information.	Directly from job applicants and employees for recruitment and employment purposes.	To process job applications and recruitment processes including working with a third party background check provider to conduct necessary background checks or obtaining job applicant resumes from third party recruitment agencies.	Service Providers, External Agencies and Regulators and Public Authorities / Government as required.
<b>8. Non-public Education Records</b> (as defined in CCPA §1798.140(o)(1)(J))	This may include but is not limited to: Education Information not publicly available.	Directly from job applicants and employees for recruitment and employment purposes.	To process job applications and recruitment processes including working with a third party background check provider to conduct necessary background checks or obtaining job applicant resumes from third party recruitment agencies.	Service Providers, External Agencies and Regulators and Public Authorities / Government as required.

We may also collect, use, or disclose the PI described above for other purposes authorized by applicable laws, including:

- to conduct internal data analysis and product development;
- to comply with law enforcement requests or legal process;
- to detect, investigate, prevent or otherwise address fraud or other security and integrity issues, or to maintain the security and integrity of our products and services;
- to exercise or defend against legal claims, including investigating those claims;
- to comply with applicable laws and regulations; or

- to form part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or transfer, divestiture, or sale of all or a portion of our business or assets

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information. We have no obligation to re-identify such information or keep it longer than we need it to respond to your requests.

### **Information Automatically Collected Online**

When you visit any of our websites (“Sites”) including national.com, nationalaircargo.com and nationalairlines.com, we may collect the following information automatically:

- Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information for our Sites, browser type and version, time zone setting, browser language setting, browser plug-in types and versions, operating system, and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may obtain this information via server logs, cookies (small data files your web browser stores on your hard drive), web beacons (small electronic images used to count web page views), or other commonly used mechanisms. For more information on cookies and other tracking devices and ways to exercise preferences regarding them, see our [Cookies Policy](#).

When you navigate to our Sites, tracking technologies such as Google Analytics and Salesforce use cookies and other, similar technologies, to collect information about how users use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google and Salesforce on servers in the US. Google will use this information for the purpose of evaluating your use of our Site, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. To learn more about Google Analytics, including how to opt out of it, visit <https://tools.google.com/dlpage/gaoptout>.

Salesforce will use the information to track lead progress by connecting to Google Ads and tracking conversion metrics. For more information on Salesforce cookies, visit [https://help.salesforce.com/s/articleView?id=sf.dato\\_getstarted\\_cookies.htm&type=5](https://help.salesforce.com/s/articleView?id=sf.dato_getstarted_cookies.htm&type=5).

### **Purposes for Collecting, Processing and Disclosing Personal Information**

We collect and process PI to ensure the proper operation of our day-to-day business and for complying with legal obligations. We collect, use and disclose the following categories of personal information for business purposes: Personal Identifiers, Personal Information Records, Protected Classification Information, Commercial Information, Internet or other similar network activity, Geolocation data, Professional or Employment Information and Non-Public Education Records.

Our third-party vendors and business partners may themselves engage services providers or subcontractors to enable them to perform services for us, which is considered sub-processing and is an additional business purpose for which we are providing you notice. For example, we may disclose each category of PI above including:

- Our service providers, whom we engage to assist with technology and operation support or other assistance through a contract where confidentiality and security of PI is protected;
- Our service providers, such as Salesforce, who are providing customer management, sales, and communications
- Third-party vendors for marketing and targeted advertising on our Sites through various tracking technologies placed on your device or browser;
- Affiliates of National for legally permissible purposes;
- Acquiring party or assignee in event of a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our company or its assets;
- Law enforcement agencies, courts, and government agencies when the disclosure is required or permitted by law, including to comply with valid legal process; or
- Other parties we believe to be appropriate when required by applicable law, including laws outside your country of residence, for legal processes, response to government and public authorities, enforcing terms and conditions for use of the Sites, including our policies, to protect and defend our rights and property and to protect the interests of National or others.

Notwithstanding anything to the contrary in our [Privacy Notice](#), we typically restrict use of your PI that is shared with third parties for business purposes.

Certain companies may place tracking technologies on our Sites, which allow those companies to receive information about your activity on our Sites that is associated with your browser or device. This information may include shared identifiers, commercial information, location information, and internet or other electronic network activity information. The companies may use that data to serve you more ads on our Sites or on others' sites. Depending on the activity involved, this activity may be considered a sale of PI or sharing of PI for targeted advertising under certain state laws. Except for this kind of selling or sharing, we do not otherwise sell PI and do not share PI with non-affiliated entities for them to use for their own marketing purposes.

#### Choices About How We Use and Disclose Your Personal Information

We strive to provide you with choices regarding the PI you provide to us on our Site. We have created the following mechanisms to provide you with control over your information:

- **Tracking Technologies and Advertising.** You can set your browser or device to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.
- **Google Analytics.** To learn more about Google Analytics, including how to opt out of it, visit <https://tools.google.com/dlpage/gaoptout>.
- **Salesforce.** To learn more about Salesforce, visit [https://help.salesforce.com/s/articleView?id=sf.dato\\_getstarted\\_cookies.htm&type=5](https://help.salesforce.com/s/articleView?id=sf.dato_getstarted_cookies.htm&type=5).

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected

or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

### **Consumer Privacy Rights**

We provide Consumers the privacy rights described in this section as provided under applicable U.S. data privacy laws and as described under the CCPA as amended or the VCDPA. To exercise your rights and make a request, you may contact National at:

- Postal Address: 350 Windward Rd., Orchard Park, NY 14127 Attn: Privacy;
- Phone: 800-635-0022;
- Email: [privacy@nationalaircargo.com](mailto:privacy@nationalaircargo.com)

If you are disabled and need reasonable accommodations to facilitate your request, please let us know. As permitted by privacy regulations, any request you submit to us is subject to an identification and verification process. We will verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include, but is not limited to, email address, mailing address, or phone number.

Some PI we maintain about Consumers is not sufficiently associated with the Consumer for us to be able to link the Consumer's PI when the Consumer makes a request that requires verification (e.g., information provided to request a quote for a business entity). If we cannot comply with a request, we will explain the reasons in our response.

We will make commercially reasonable efforts to identify PI that we collect, process, store, disclose and otherwise use and to respond to your Consumer privacy rights requests. We will typically do not charge a fee to fully respond to your requests; however, we may charge a reasonable fee if the request is deemed excessive or overly burdensome. We may also refuse to act upon your request if it is deemed to be repetitive or unfounded. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision.

Consistent with the applicable regulations and our interest in the security of your PI, we will not deliver your social security number, driver's license number or other government-issued id number, financial account number, any health information, an account password, or security questions or answers in response to a Consumer privacy rights request.

### **Additional Disclosures and Rights for Residents of California:**

#### **Right to Know:**

You have the right to send us a request using one of the methods listed above, no more than twice in a twelve-month period, for any of the following for the period that is twelve months prior to the request date:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.

- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.

You have the right to make or obtain a transportable copy using one of the methods listed above, no more than twice in a twelve-month period, of your personal information that we have collected in within that twelve months prior to the request date and are maintaining. Please note that personal information is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back 12 months prior to the request.

**Right to Delete:**

Except to the extent we have a basis for retention under CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining using one of the methods listed above. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with law, to exercise or defend legal claims, and to cooperate with law enforcement. We are not required to delete your PI that we did not collect directly from you. You may be required to execute an attestation under penalty of perjury to validate your request and exercise the deletion.

**Right to Correct:**

You have the right to request that we correct PI that we maintain about you if you believe it is inaccurate. We may request documentation from you in connection with your request. Upon receipt of a verifiable request to correct inaccurate PI, we will use commercially reasonable efforts to correct the PI.

**Right to Opt Out of Sales and Sharing of Personal Information:**

You may opt out of the Sale or Sharing of your PI by adjusting your Cookie Settings through the "Cookie Settings" link in the cookie banner at the bottom of our website. We have also enabled the Global Privacy Control, which is designed to recognize opt-out preference signals. To process your request through an opt-out preference signal, you must use a browser or extension supporting the preference signal. If you choose to use an opt-out preference signal, you will need to turn it on for each browser and each device you use.

**Sensitive Personal Information**

We do not collect Sensitive PI for the purpose of inferring characteristics about you. We do not use or disclose Sensitive PI for purposes to which the right to limit use and disclosure applies under the CCPA.

**Non-Discrimination:**

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

**Authorized Agents:**

Authorized agents of Consumers may make a request using one of the methods listed above. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process, and confirmation of the agent's authority, which may include attestation under penalty of perjury. Absent a power of attorney, we will also require the Consumer to verify their own identity.

### Additional Disclosures and Rights for Residents of Colorado, Connecticut, Utah and Virginia

This section applies to Colorado, Connecticut, Utah and Virginia residents, as defined by their respective regulations, that access or use our products or services, and describes our collection, use, and disclosure of personal information.

If you are a resident in the states listed above, subject to certain conditions and restrictions set out in their respective regulations and other applicable laws, you have the following rights regarding your Personal Data:

#### **Disclosure:**

You can learn about the categories of PI we process, the purposes for processing your PI and the categories of third parties with whom we may share your PI by reviewing the relevant section of this notice above. We may process your PI for targeted advertising when you use our Site.

#### **Sensitive Information:**

You have the right to be notified and provide affirmative consent prior to our processing of sensitive data about you as that term is used in the US state laws listed above as applicable. We do not collect sensitive data about you unless we provide specific notice prior to the collection and obtain your affirmative consent.

#### **Right to Access, Confirm and Portability:**

You have the right to request access to and obtain a copy of any PI we may hold about you. You have the right to confirm whether we process your PI. You have the right to obtain a copy of any PI we may hold about you.

#### **Right to Correct:**

You have the right to request that we correct inaccuracies in your Personal Data.

#### **Right to Delete:**

You have the right to request that we delete Personal Data we have collected from or obtained about you.

#### **Right to Opt Out of Targeted Advertising:**

You have the right to request that we stop disclosures of your Personal Data for targeted advertising. You may opt out of Targeted Advertising by adjusting your Cookie Settings through the "Cookie Settings" link in the cookie banner at the bottom of our website.

#### **Right to Opt Out of Sales:**



You have the right to opt out of Sales of your Personal Data.

**Right to Opt Out of Profiling:**

You have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. We do not profile in a manner that would result in legal or similarly significant effects and as such do not offer this right.

**Right to Appeal:**

If you are unsatisfied with our actions related to the exercise of one of your privacy rights above, you may appeal our decision.

**Right to Contact the Attorney General**

If you are unsatisfied with the results of your appeal, you may contact the Attorney General of your state for the US state laws listed above.

Limitations on Rights:

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your consumer rights. In addition, we do not need to honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

**Site Use Limitations and International Visitors**

Our Sites are not directed to users under the age of 16 and we do not knowingly collect PI online from any person we know to be under the age of 16. We also do not knowingly sell or share PI of individuals under the age of 16.

**Data Retention**

We keep the categories of PI described above for as long as is necessary for the purposes described in this Policy or otherwise authorized by law. This generally means holding each category of information for as long as necessary depending upon whether your PI is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collect the information. The retention also depends on whether your PI is reasonably necessary to carry out a disclosed purpose that is compatible with the context in which the PI was collected, whether the PI is reasonably required to protect or defend our rights or property (based on applicable law), or whether we are otherwise required or permitted to keep your PI by applicable laws or regulations.

Where PI is used for more than one purpose, we may retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

**Changes to Consumer Privacy Notice**

We reserve the right, at any time, to modify, alter, or update this Notice, and any such modifications, alterations, or updates will be effective upon posting. In the event we modify this Consumer Notice, your

continued use of our website will signify your acceptance of the modified Consumer Notice. The time stamp you see will indicate the last date it was revised.