

NUAIR PRIVACY POLICY



Effective date: January 1, 2023

Last modified date: February 6, 2023

NUAIR (“us”, “we”, or “our”) operates the Website <https://nuair.org>

This Privacy Policy applies to the NUAIR (Northeast UAS Airspace Integration Research Alliance Inc.) website and governs data collection and usage. By using the NUAIR website, you consent to the data practices described in this statement.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website

Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number ("**personal information**");
- That is about you but individually does not identify you, such as demographic information; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.

- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Your responses to surveys that we might ask.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access

certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Web Beacons.** Pages of our the Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

Information Use

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

Information Sharing

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts.
- We may allow selected third parties to use tracking technology on the Website, which will enable them to collect data on our behalf about how you interact with our Website over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

Choices About How We Use and Disclose Your Information

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse

cookies, please note that some parts of this site may then be inaccessible or not function properly.

- **Opt-out of email communications.** If you do not wish to have your email used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to info@nuair.org. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. If received from a third-party email distribution application (ex. MailChimp or Constant Contact), click the Unsubscribe link at the bottom of the email.

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.

Web and Mobile Analytics

Google Analytics

Use of Cookies and other Tracking Technologies

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

Storing Information

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice and under the Terms and Conditions of this site, unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely

store your personal information and isolate it from any further processing until deletion is possible.

Information Protection

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

Information collection from minors (CHILDREN)

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@nuair.org.

Privacy Rights

You may review, change, or terminate your account at any time.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at info@nuair.org.

Embedded Content from Other Websites

Articles and marketplace vendors on this site may include embedded content, like YouTube videos, for example. Embedded content from other websites behaves in the exact same way as if you visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Review, Update, or Delete Collected Data

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please email us at info@nuair.org.

Amendments

NUAIR may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy.

Notice to California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, please see the following:

California Consumer Privacy Act

The California Consumer Privacy Act of 2018 (“CCPA”) became effective on January 1, 2020 and creates a variety of privacy rights for California consumers. We share the same information about our practices with everyone but use this notice to make disclosures required by the CCPA.

This notice includes the following parts:

- **Transparency:** We are transparent about how your personal information is collected, used, shared and sold.
- **Control:** We put you in control of your personal information, including accessing and deleting your personal information.
- **Benefits to You:** We use your personal information to benefit you and to make your experiences better.

TRANSPARENCY

What Personal Information We Collect

You have the right to know what kinds of personal information SMC is collecting and our business purposes for that collection.

We make this information available to consumers in the “Information We Collect About You and How We Collect It” section on our Privacy Policy,

How We Use Your Personal Information

You have the right to know how personal information is obtained, how it is used, and our business purposes for that use.

We make this information available to consumers in the “Information We Collect About You and How We Collect It” section on our Privacy Policy

How We Share Your Personal Information

You have the right to know if your personal information is shared with any third parties. We may share personal information to have Service Providers, as defined by the CCPA, perform services specified by written contract. In addition, we may share personal information with third parties for other notified purposes, as permitted by the CCPA.

We make this information available to consumers in the “Disclosure of Your Information” section on our Privacy Policy.

We Do Not Sell Your Personal Information

You have the right to know whether your personal information is being sold. Your personal information is sold when it is shared with a third party for monetary or other valuable consideration for a purpose that is not a “business purpose” as set forth in the CCPA.

CONTROL

Right to Know, Right to Receive, Right to Delete

You have the right to:

- **Know** what specific pieces of personal information SMC has collected and retained about you over the previous 12 months.
- **Receive** a copy of your personal information.
- **Delete** your personal information.

Right to “Opt-out” of “Sale”

You have the right to opt-out of the sale of your information. Please see the “Choices About How We Use and Disclose Your Information” section of our Privacy Policy for all opt-out rights.

BENEFITS TO YOU

Financial Incentives

The CCPA allows businesses to offer consumers financial incentives for sharing personal information. For example, a business can offer a rewards program or provide a premium service to consumers as compensation for their personal information. Where SMC offers these programs, your participation is optional. If you choose to participate, your participation will be subject to any applicable terms, and you may withdraw at any time.

Non-Discrimination

The CCPA prohibits businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices. The CCPA permits businesses to provide differing levels or quality or different prices where the business can demonstrate that the difference is reasonably related to the value to the business of the consumer’s personal information.

Disclosure of privacy rights requests

The CCPA requires businesses to disclose the number of requests received, complied with in whole or in part, or denied. Requests to view and delete personal data are fulfilled immediately. Requests to access and delete personal data are fulfilled within 30 days.