



STARLITE

AVIATION GROUP

PURPOSE OF THIS PRIVACY STATEMENT

When engaging with us, you agree to trust Starlite with your personal information. We are committed to protecting your right to privacy. We take all reasonable steps to keep your personal information safe and confidential. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in line with the Protection of the Personal Information Act (“POPIA”).

Note: Starlite Aviation Group complies with the SACAA POPI requirements.

Starlite Aviation Group – Privacy Statement

1. Company Definitions

1.1 Starlite Aviation Group referred to as: 'Starlite' or 'the company'	Refers to Starlite Aviation Group, a private company offering aviation services and products, registered under the company laws of the Republic of South Africa, registration number 2005/019551/07 . The principal address: Hangar 123, Virginia Airport, Durban North, 4051.
1.2 You and your	Refers to you the data subject
1.3 Our, us and we	Refers to Starlite Aviation Group (See 1)
1.4 Your personal information	Refers to personal information about you, your employer and members, and all information collected from you, your spouse, dependents and beneficiaries. It includes information about health, financial status, gender, age, contact numbers, email address and place of residence. The Company's accounts, communications, human resources, training Academy, aero sales and maintenance departments will retain your information in line with POPI and GDPR .
1.5 Process information	Means the automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.
1.6 Competent person	Means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child, for example a parent or legal guardian.
1.7 Process information	Means the information that Starlite Aviation Group collects, stores and disseminates (subject to the laws governing us
1.8 Data subject	Our clients/customers – data subjects

2. Purpose of processing your personal information

You agree that we may process your personal information for the following purposes:

- 2.1 Providing information on our products and services
- 2.2 Collection of data where you have entered into a contract for our products and services
- 2.3 Allowing any of our staff/employees to contact and advise you about new products and services that will be of benefit to you by:
- 2.4 Any company in the Starlite Aviation Group
- 2.5 Any third-party provider
- 2.6 Any financial services provider or its representative approved by Starlite Aviation Group
- 2.7 Providing relevant information, including your personal information, to a contracted third party who needs the information to provide a service to you relating to a contract or document signed when entering into an agreement with our company. We will ensure that the third party agrees to keep the information confidential and is registered under the POPI ACT:

https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinformationcorrect.pdf

3. Indemnification

- 3.1 Each Starlite company accepts responsibility to the extent that the processing activities of personal information falls under the control of that party or company.
- 3.2 You agree to indemnify Starlite or any third party against any loss or damage, direct or indirect, that you, the data subject may suffer because of any unauthorised use of personal information or if a breach of personal information occurs unintentionally, but only if the processing of your personal information is controlled by that party, who in turn is governed by the laws governing the POPI Act and/or GDPR.

4. Voluntary acceptance of this Policy Statement

- 4.1 You have the right to object to the processing of your personal information. It is voluntary to accept these terms and conditions contained in this policy. We require your acceptance to provide you with information on our products and services. We only use personal information that you consent to provide. All information that is or will be collected, has a disclaimer, where you have the right to object to the collection thereof. We only collect and process personal information for valid and lawful reasons. The acceptance of these terms and conditions and the permission given to process your personal information and will continue until a contact ends or you request otherwise.

5. Confidentiality of personal information

- 5.1 We keep your personal information confidential. It will only be used to process information that is required by aviation law of the SACAA, other legal bodies or for providing you with product or service information. You will have had to agree to the collection of your personal information, for example for our website forms, contracts or CVs. If we do happen to collect your personal information for any other reason, you will be required to give consent, including for information from other third-party sources. If you share your personal information with any third parties that are linked in anyway with Starlite, we will not be held responsible for any loss suffered by you.

6. Authority to act for other people

- 6.1 When you give us personal information about third parties, which may include a person under 18 (a minor), you must have received their permission or permission from their guardian.
- 6.2 You must understand that when you include, your employees, their spouse, dependents and beneficiaries on any document that will be collected, processed and/or stored. We will furthermore process their information for the purposes set out in this Privacy Statement and other related purposes.

7. Sharing personal information with third parties

You will have to agree that we may process your personal information and that of your dependents for the following purposes:

- 7.1 The administration purposes, for example, where the issue of pilot licences through the SACAA need information to be processed to achieve the outcome.
- 7.2 The provision of any products and services to which you have prescribed or requested
- 7.3 The rendering of services by Starlite Aviation Group
- 7.4 The provision of relevant information to a contracted third party who requires such information to render a service to you or any dependent and only if such contracted third party agrees to keep the information confidential.

8. What do you agree to, subscribe to these conditions:

By subscribing to Starlite's Privacy Statement, you confirm you give consent to the sharing this information with the relevant persons within 'the company' when:

- 8.1 Personal information, is necessary to ensure the efficient administration procedures within the Starlite Aviation Group to ensure that we comply with all relevant legislation.
- 8.2 Process information using automated means (without human intervention in the decision-making process) to make a decision about you or your application for any product or service.
- 8.3 You agree to indemnify us against any loss or damage, direct or indirect, that you may suffer because of the unauthorised use of your personal information by a third party outside the Starlite Aviation Group of companies as long as the information does not emanate from 'the company'.

9. If a third party is involved for business transactions with Starlite and request any of your personal information, we shall share it only if:

- 9.1 You have already given your consent for the disclosure of this information to that third party.
- 9.2 Third parties that we sub-contract, to provide services to you, for example auditors, other aviation providers that we may contract to fulfil one of our services or any third parties involved in our business dealings.
- 9.3 Any person from Starlite Aviation Group that has a legal right to access the information, for example, board members, directors, HR department or communications department and operators, will only do so if access has been granted from the data subject and for business purposes only.

10. Sanction screening

You consent and agree that:

- 10.1 We may process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists.
- 10.2 You also consent to us communicating such personal information to local and international Regulatory Bodies as well as to other entities if you are matched to one of these sanctions lists.
- 10.3 You understand that we may terminate this agreement with immediate effect if you are found to be on a sanctions list.

11. Sharing personal information with Starlite Aviation Group

You confirm that we may share your personal information within the Starlite Group of companies for all of the following:

- 11.1 Administration
- 11.2 Fraud prevention.
- 11.3 Providing Group-wide services, benefits and infrastructure (where necessary) to help you in your personal or professional capacity.

12. Sharing for research and improvement purposes

You also confirm that we may share and combine all your personal information for any one or more of the following purposes:

- 12.1 Market, statistical and academic research; and
- 12.2 To customise our products and services to meet your needs
- 12.3 You confirm that we may approach electronically for your feedback on our products and services. You will, however, have the option to unsubscribe and/or asked to be removed from our database.
- 12.4 You agree that your personal information may be shared with third parties including those outside South Africa where in doing so you will benefit from the dissemination of information. We ensure that the information will remain confidential and all data will be made anonymous to the extent possible and where appropriate. No personal information will be made available to a third party unless that third party has agreed to abide by strict our strict confidentiality and POPI data protection protocols that we uphold and provide proof thereof in writing.
- 12.5 Should any data be used for customer analysis and will be published, you will not be identified by name. If we want to share your personal information for any other reason that expressed in, we will do so only with your permission.

13. Agreement to check your information against regulatory bodies

- 13.1 By agreeing to this policy, you agree to the sharing of your information for example, for credit worthiness checks, criminal record checks, other reference checks and other legal requirements to do with you.
- 13.2 Information, collected stored and disseminated will be done in accordance with our strict adherence to the POPIA/GDRP legislation.
- 13.3 In addition, you authorise us to obtain and share information about your creditworthiness with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgements, default history and sharing of information for purposes of risk analysis, tracing and any related purposes, as well as using your information with a third party as described in point 9.

14. Right to communicate electronically

- 14.1 We have the right to communicate with you electronically about any changes to your personal information.

15. Obtaining personal information for data quality purposes

- 15.1 We have a duty to take all reasonably practicable steps to ensure your personal information is completed, accurate, not misleading and updated on a regular basis.
- 15.2 We have a duty to keep you updated about any offers and new products that we make available from time to time. Any entity within Starlite Aviation Group and contracted third-party service providers may communicate with you about these.

16 Direct Electronic Marketing from the Starlite Website

- 16.1 You may opt out of Electronic Marketing on any bulk electronic communication and our website www.starliteaviation.com.
- 16.2 We store your personal information for the purpose to action this request only and delete you from our system.

Your rights to the storing of your information:

- 16.3 You have the right to refuse the storing of your information collected from website enquiries.
- 16.4 You have the right to ask us to update, correct or delete your personal information. However, this will prevent you from receiving any new products or services, discounts or specials that we may be offering.
- 16.5 You agree that we may keep your personal information until you ask us to delete or destroy it or for the period during which our mutual contract states or is dictated by the nature of the business.

17. Bodies that govern the storing of personal information to which Starlite is affiliated

The following are examples of bodies and laws that require us to collect and keep personal information:

- 17.1 The SACAA Act – governing the Aviation Industry in South Africa
- 17.2 Basic Conditions of Employment Act
- 17.3 Employment Equity Act
- 17.4 Labour Relations Act
- 17.5 Skills Development Act
- 17.6 Aircraft Insurance Act
- 17.7 The Electronic Communications and Transactions Act (ECT)
- 17.8 The Financial Intelligence Centre Act (FICA)
- 17.9 The Financial Advisory and Intermediary Services Act (FAIS)
- 17.10 The National Credit Act (NCA)
- 17.11 The Collective Investment Schemes Control Act (CISCA)
- 17.12 The Consumer Protection Act (CPA)

18. Transferring your personal information outside South Africa

You agree that we may transfer your personal information outside South Africa to our other Starlite companies and third parties:

- 18.1 If you provide an email address that is hosted outside South Africa; or
- 18.2 To administer certain services, for example, cloud services; and
- 18.3 Where required to administer any offshore product.
- 18.3.1 We will take reasonable steps to ensure that any country, company or person to which we are required to send personal information to, to comply with our agreement to treat your information with the same level of protection as required by the laws of the country to which the information is transferred.
- 18.4 Sharing your personal information for merger, acquisition or sale purposes. If we become involved in a proposed or actual merger, acquisition or any form of sale of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.

19. Changing this Privacy Statement

We may change this Privacy Statement at any time. The most updated version will always be available on the Starlite website www.starliteaviation.com

We thank you for your cooperation and compliance to the POPI Act and our Policy Statement.

Committed. Experienced. Passionate.