

## **GLOBAL DATA PRIVACY POLICY**

Last updated February 2020

This is the Global Data Privacy Policy ("Privacy Policy") of Prospect Airport Services, Inc. and its affiliate and subsidiary entities ("Prospect" or the "Company"). In order to provide an access point to the services we offer, we maintain our website at [www.prospectair.com](http://www.prospectair.com). This website may ask for and collect your personal data in order to provide you with our services, enhance your experience, and provide you with other relevant information about our offerings. This Privacy Policy applies to activities the Company engages in on its website and activities that are offline or unrelated to its website, as applicable. We are providing this notice to explain our information practices and the choices you can make about the way your information is collected and used.

This Privacy Policy sets forth the principles that govern our treatment of personal data. We expect all employees and those with whom we share personal data to adhere to this Privacy Policy.

The Company is committed to protecting the information that our customers, employees, suppliers, and others have entrusted to us.

This Privacy Policy applies to all personal data collected by Prospect, relating to all customers, employees, suppliers, and others who do business with the Company.

### **NOTE TO EU AND NON-EU RESIDENTS**

The Company respects all individuals' privacy rights under all the laws that apply to it, all over the world. We work to comply with privacy laws, including, but not limited to, any right you may have if you live in or visit the United States, where our operations are located.

The Company voluntarily tries to accommodate privacy requests made by individuals. Each request is evaluated to determine whether it can be accommodated without violating legal obligations and without creating a risk to the security or integrity of other information we hold.

For residents of the European Union ("EU") and European Economic Area ("EEA"), the Company recognizes the legal privacy protections afforded to individuals located in the EEA and the EU, with regard to personal data. For more information about this, please read the [Notice to Residents of the EU and EEA](#) provided below.

## **PERSONAL DATA WE COLLECT AND USE**

### **General Information**

When you use the Internet, your computer may transmit certain information to the servers that host the websites you visit. The information includes your Internet Protocol (IP) address, if you submit an employment questionnaire using our website.

### **Google Analytics**

*How We Use Google Analytics:* We may use Google Analytics, so that we can generate statistics on website usage.

*Your Control of Google Analytics:* According to its own policy, Google does not collect any personal data using Google Analytics. Nevertheless, if you wish to opt out of Google Analytics, you may install the Google Analytics opt-out browser add-on at <https://support.google.com/analytics/answer/181881?hl=en>.

## **Personal Data**

We only collect personal data that you provide to us, or that we are authorized to obtain by you or by law. The types of personal data we collect from you will depend on how you are interacting with us using our website and services. For example, we may collect different information from you when you ask us to contact you about employment opportunities, or if you contact us with requests, feedback, or suggestions about our services.

*Third Parties Authorized By You, Including Your Airline:* When someone else arranges for you to use our services, they may provide us information so that we can provide you with such services during your travel. Such information may include: your name, flight arrival and departure information; passenger name record codes, and information about any health conditions, disabilities, or accommodations relating to the services we are to provide you. For example, if you need wheelchair assistance at the airport, your airline may provide us with the information we need to identify you and provide you wheelchair services.

### *Vendors, Suppliers, and Others Doing Business with Us*

As noted above, most of the personal data we receive about you is provided by your airline who collects such information. Your airline may have hired us to provide you services during your travel, and your airline provides your information to us so that we can provide the services to you. We have strict rules in place to comply with the laws that apply to us. Before we do business with a third party, we take reasonable steps to make sure that they will prudently protect the information we share with each other, including your personal data.

*When you use our services,* we may, in addition to the information provided by your airline, collect your acknowledgment and feedback regarding services received.

*If you report a problem or incident,* we may collect information we need to investigate and/or resolve the problem or incident, including your name; physical address; email address; phone number; information about the services we provided to you; information about any health conditions, disabilities, or accommodations that required our services; and if applicable in rare circumstances, police report information.

## HOW WE MAY USE YOUR INFORMATION

**Your privacy is important to us. We collect and use information we believe is necessary to do our business, and to provide you with the services and experiences you expect from us. When we collect and use your information, we take your privacy and security very seriously.**

We collect personal data to provide services to you. We will use the information provided by you or on your behalf to provide the requested services, such as wheelchair services or travel assistance. We also may use your information in other ways for our business purposes and to provide you with the services and experiences requested and expected from us, including but not limited to the following purposes:

- Fully respond to your questions, requests, or communications
- To provide you with services, including but not limited to wheelchair and other travel services
- To return lost items or baggage to you
- To address any incidents that may happen when you use our services
- To improve and personalize the experience for you and others
- To complete and maintain records of transactions with individual customers following use of services;
- To audit, research, and conduct analysis in order to maintain and improve our services and to protect people who use our services
- For reservations and/or requests for information or services
- To ensure third parties protect your information
- To comply with applicable laws, regulations, and legal obligations
- For safety and security, including working with third parties to help protect your information
- To ensure the technical functioning and security of our network
- To protect the rights or property of the Company, its employees, and people who use its services

## HOW WE SHARE INFORMATION

We may share information about you to third parties as indicated below:

*Affiliates:* We may share your personal data with our locations, subsidiaries, and third parties if we need to. If we share your information, we will share only the information that is necessary and we will take reasonable steps to make sure that third parties take prudent steps to protect your information.

*Agents:* We use others to help us provide some of our services (e.g., maintenance, IT support, human resources, analysis, development, security). Unless we tell you differently or as described elsewhere in this Privacy Policy, our agents are expected not to have the right to use your information beyond what is needed to assist us.

*Legal Requests:* We may be required to respond to legal requests for your information, including from law enforcement authorities, regulatory agencies, third party subpoenas, or government officials.

*Compliance with Legal Obligations:* We may have to disclose certain information to auditors, government authorities, or other authorized individuals in order to comply with laws that apply to us or other legal obligations such as contractual requirements.

*Changes in Business Structure/Ownership:* We may disclose or transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of the Company's business, assets, or ownership interest (including any bankruptcy or similar proceedings).

## **YOUR CHOICES REGARDING YOUR INFORMATION**

For all personal data that we collect about you, you may have the following rights and/or choices that we will accommodate where your requests meet legal and regulatory requirements and do not risk making our other data less secure or changing our other data. You may also designate an authorized agent to make a request on your behalf. The Authorized Agent must provide written proof of your permission to act on your behalf such as a valid, verifiable, and notarized Power of Attorney or (b) other written authorization that we can verify. You may also have to verify your identity with us directly when an authorized agent submits a consumer request on your behalf.

*Access, Erase:* You may have the right to know what information is being collected about you, to access your personal information, to receive a copy of your information, and to know whether your personal information is disclosed and to whom. You also may request that we erase your information. If you have questions about your information or want to ask us to erase your information, please contact us using the methods in the Contact Us section below.

*Data Portability:* If you would like to request that we provide a copy of your information to you, please contact us using the methods in the Contact Us section below.

*Non-Discrimination:* You have the right not to receive discriminatory treatment by the Company for the exercise of your privacy rights. If you have any questions, please contact us using the methods in the Contact Us section below.

*Responding to Requests:* Your request will be evaluated to determine whether the requested change meets legal regulatory requirements and does not risk making our other data less secure or changing our other data. When you submit a request as provided herein, we will ask you to provide some information in order to verify your identity and respond to your request as follows:

- If you are an individual customer of Prospect (a natural person), we will need you to provide your name, email or phone number, and other information that would identify your prior transaction or business with Prospect (such as name, flight arrival or departure information, airline, flight number, passenger name record code, or possibly service requested/used).

## **YOUR CALIFORNIA PRIVACY RIGHTS**

California law requires us to inform California residents who have provided us with personal information that they may request information from us about our disclosures to third parties for their direct marketing purposes. Prospect does not share individuals' personal information with third parties outside of Prospect for those parties' direct marketing use. To request information, please contact us using the methods in the Contact Us section below.

Prospect has collected the following types of information from consumers within the past twelve (12) months:

- Name;
- Contact details, including physical address, email address, phone number, emergency contact information and phone number;
- Flight information;
- Passenger name record codes;
- Credit or debit card information or shipping account information;
- Information about health conditions, disabilities, or accommodations that may require our services or relating to our services;
- IP address; and
- Other information that individuals have chosen to provide to us.

**Prospect does not and will not sell or disclose information about consumers to a third party for a business or commercial use.**

## **HOW WE PROTECT YOUR PERSONAL DATA**

We strive to take appropriate security measures to help safeguard your personal data from unauthorized access and disclosure. For example, only authorized employees are allowed to access personal data, and they may only access it for permitted business functions. We also use technology to protect your information, including encrypting sensitive personal data that is transferred to or from our systems.

While we cannot guarantee that loss, misuse, or alteration will never occur, we use reasonable efforts to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our services and provision of information to us is at your own risk.

Please be aware that our website may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those websites linked to our website are not covered by this Privacy Policy. We are not responsible for the privacy policies of other websites to which our website links. If you provide any information to such third parties, different rules regarding the collection and use of your personal data may apply. We strongly suggest you review such third party's privacy policies before providing any data to them.

## **NOTICE TO RESIDENTS OF THE EU AND EEA**

If you reside or otherwise find yourself in the European Economic Area or European Union, the Company is committed to respecting your rights as a data subject under the applicable laws of these countries. If you have a privacy concern or question about how your personal data is used, please contact us using the methods in the Contact Us section below.

Consistent with our values, we observe the following privacy principles when collecting or processing your personal data:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified and legitimate purposes and will not be processed in ways that are incompatible with those purposes.
- Data collection and use will be limited to what is relevant for the specified purposes and will not be excessive. We will limit the amount and type of information gathered to what is necessary for the uses and purposes defined in this Privacy Policy.
- We will only collect and process personal data about you where we have a lawful basis. Lawful bases include consent (where you have given consent), contract (where we must process your personal data based on a contract we have with you or someone else, for example, to deliver requested services), and legitimate interests (where processing is necessary for the purposes of compelling legitimate interests of the Company that are not overridden by your rights).
- Data subjects in the European Union and European Economic Area may be asked to provide their clear and unambiguous consent for collection, processing, and transfer of their personal data where required.
- We will keep your personal data as accurate, complete, and up-to-date as necessary, and we will take reasonable steps to correct or delete personal data that is inaccurate or incomplete. If you think that your information is inaccurate or incomplete, please contact us using the methods in the Contact Us section below.
- Data will only be kept where it is necessary for the purposes for which it was collected and processed. Those purposes are defined in this Privacy Policy.
- We are required by law to comply with many regulations that require us to keep information, including your personal data, for varying time periods. We must evaluate any request to change or delete information, including your information, prior to fulfilling such request to make sure that the requested change or deletion meets legal regulatory requirements and does not change our other data or make it less secure.
- Your data will be deleted or amended if we receive a relevant request from you, if we are permitted by law to do so, and if making the change does not risk making other data less secure or risk changing other data. Please contact us using the methods in the Contact Us section below to submit a request.
- We have taken appropriate measures to prevent unauthorized access, loss, use, or damage to your personal data.

*International Transfers of Personal Data:* If you are located outside the United States and you interact with our website or provide your personal data, then your personal data may be transferred to the United States. If you are located in the European Economic Area or the European Union, please note that the United States currently is not on the list of countries that the European Commission considers adequate regarding the protection of personal data.

## **CHANGES TO THIS POLICY**

We reserve the right to modify or change this Privacy Policy at any time. When we make a material change to this Privacy Policy, we will inform you by posting a prominent notice on the home page of our website or changing the date on this page noting when the Privacy Policy was last updated.

## **CONTACT US**

For questions regarding this Privacy Policy, help with accessibility to this Policy, or to submit any of the verifiable requests mentioned above relating to your personal data, contact us using any of the following options:

*Toll Free Number*

1-888-505-8317, press 2 for Privacy

*Consumer Request Form Link*

*Mail*

Prospect Airport Services, Inc.

Attn: Privacy

2130 South Wolf Rd.

Des Plaines, IL 60018

*Email*

Privacy@ProspectAir.com