

147training.com PRIVACY POLICY

GENERAL PROVISIONS

Data Controller: UAB FL Technics: number of legal entity 300517602, address Rodunios kelias 2, 02189 Vilnius, Lithuania, e-mail info@fltechnics.com (hereinafter – “**FL Technics**”, “**We**”, “**Ours**”) processes personal data of the data subjects in accordance with the highest legal and technical standards of personal data security. Our Data Protection Officer's contacts: privacy@fltechnics.com.

In processing the personal data, we responsibly comply with Regulation No 2016/679 of the European Parliament and of the Council as of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter – “**GDPR**”), the Republic of Lithuania Law on the Legal Protection of personal data, the Republic of Lithuania Law on Electronic Communications, and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

If you have any questions regarding this Privacy Policy, or requests regarding the processing of your personal data, please send us an email to: privacy@fltechnics.com.

WHEN THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to the Data Controller’s services provided through website www.147training.com (hereinafter – “**Site**”), including the Site support, regardless of the devices used by the customer of the Data Controller and/or the visitor to the website. The terms and conditions of the Privacy Policy apply to you every time you access the content and/or the service we provide, regardless of which device (computer, cell phone, tablet, TV, etc.) you are using.

This Privacy Policy does not apply to references to other entities' websites provided on the Site; therefore, we recommend that you read the personal data processing rules applied on such websites.

WHAT PERSONAL DATA WE PROCESS AND FOR WHAT PURPOSE

When you create an Account and acquire the status of the Registered User and use any services provided on the Site, FL Technics may collect and store the following Personal Information (if the Registered User submits such data):

- Your first and last names, company name (including your position), email address, phone/fax number, date of birth, country (required for training certificate);
- additional information from you or about you in other ways not specifically described hereinabove (for example, information related to your contacts with FL Technics, storing results when responding to a survey, payment information of purchased services (training courses or any other services available on the Site), etc.).

By using the Site, you acknowledge being aware of the fact that Internet transmissions may not be completely private or secure; other information from your interaction with the Site, the Site Services, content and advertising, including discussions, chats, requests, correspondence through the Site, etc.

The personal data provided above may be processed also for archiving purposes and/or FL Technics defending its legal interests.

The collection of personal data by cookies is covered in the Cookie Policy (link to the Cookie Policy may be found at the bottom of this Site by selecting “Cookies Management”).

The Registered User may check, review and amend most of his/her Personal information provided on the Site by signing on to his/her Account and using settings on the Site (if available) unless in particular case it is stated otherwise.

DIRECT MARKETING

For direct marketing purposes, we process data in the following cases:

- when we obtain your explicit consent to receive direct marketing messages (e.g., this includes information about special offers, relevant updates about new services and products, invitations to events, etc.). Please be advised that you may opt out of such e-mails at any time;
- when you are a customer of ours and we need to send you relevant information related to the services provided to you (e.g., information related to acquired trainings).

For the purpose of direct marketing, we process the following of your personal data: email address, name and surname if provided.

You may opt-out of receiving direct marketing communications at any time by: (i) clicking the “Unsubscribe” link at the bottom of our marketing emails; (ii) contacting us directly via email privacy@fltechnics.com.

HOW WE OBTAIN YOUR DATA

- When you submit your data to us through our Site;
- By concluding both electronic (“Term and Conditions”, “General rules”) or/and paper service or other contracts;
- During events/meetings, by submitting business cards or other personal data;
- By email when contacted at our general email addresses: privacy@fltechnics.com, info@147training.com or submitting your request via [147training.com](https://www.147training.com) contact form;
- When you contact any of our employees by email;
- When you agree to provide your data, for example, by subscribing to a newsletter;
- When you access your account through third party accounts (Facebook, LinkedIn, Google);
- When you agree to the installation of cookies on your device;
- Or otherwise, when you provide to us, or when we obtain information from third parties with your consent.

WHAT ARE THE LEGAL BASIS FOR PROCESSING

- Contract performance (sale/purchase of products/services);
- Consent to receive offers and news from us. You may revoke your consent to processing your personal data at any time. Unless the Company has any other legal basis for processing personal data, the Company will terminate the processing of such personal data and destroy the data;
- Legitimate interest is to respond to your queries, to provide the information you request, to improve our service quality and products, statistics and analytics, personalised services, etc.
- Implementation of legal obligations (accounting, archiving, data breach notification, etc.).

HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We will retain your personal data for as long as necessary to achieve and fulfil the purposes set out in this Privacy Policy, taking into account the nature of the services provided to you and the contracts you enter into, unless longer storage of personal data and related documents is required by applicable laws and regulations and is necessary (e.g. mandatory time limits for accounting and others, etc.) or is required for the defence of the Data Controller's legitimate interests in judicial or other public institutions.

We ensure and take all necessary measures to avoid storing outdated or unnecessary information about you and to keep your data up-to-date and accurate.

We will use your data for direct marketing purposes for 3 (three) years after you have given consent or until you withdraw your consent.

HOW WE PROTECT YOUR DATA

We responsibly implement appropriate organisational and technical data security measures intended for the protection of personal data against accidental or unlawful destruction, alteration and disclosure, as well as against any other unlawful processing. The security measures we implement include the protection of personnel, information, IT infrastructure, internal and public networks, as well as office buildings and technical equipment.

We recommend that you additionally comply with the following minimum safeguards for personal data protection:

- do not visit suspicious websites;
- do not open links of uncertain origin;
- update your software regularly;
- independently take care of using antivirus protection.

Unfortunately, the transmission of any information on the Internet is not completely secure. Although we are endeavouring to protect your personal data, it is not possible to ensure the full security of personal data when you provide the data on the Site, therefore, you must assume the risks associated with the transfer of personal data to the Site.

In the event of personal data breach of security that could seriously jeopardise your rights or freedoms and determine the circumstances under which unauthorised access to personal data has been obtained, we will immediately inform you about it.

TO WHOM YOUR DATA IS DISCLOSED

Your personal data may only be accessed by a limited number of our employees and by our company's IT, legal, personnel service providers, and only to the extent necessary for the proper processing of your personal data, and subject to strict confidentiality requirements.

To achieve the purposes set out in this Privacy Policy, we may transfer or grant access to your data to the following data recipients/processors:

- Certain technical data on your website visits (IP address, cookies, technical information of your browser, other information related to the browser's activity and browsing the site) may be transmitted or made available to the website for statistics, analysis and related purposes both for entities operating in the EU and outside the EU (e.g., when we use the Google Analytics service).
- For the provision of some of our services, data can also be transferred to the companies of the Avia Solutions Group (ASG) PLC, which we belong to (<https://aviasg.com/en/media/logos>), including those located outside the European Economic Area (EEA).
- within the interest and according to the order of data processors who provide services and process your data on our behalf (e.g. consultants, etc.). We note that our data processors process your data only on the basis of our explicit instructions, by committing to ensure the proper processing of data protection, organizational and technical measures compliant to confidentiality and security requirements, as specifically discussed in the agreements concluded between us and the service providers regarding the processing of data.
- Entities entitled to receiving information in accordance with legal requirements (e.g. courts, state and municipal authorities, etc.) only to the extent necessary for the proper performance of the requirements of the legislation in force.
- other business entities, in case of merger or acquisition of FL Technics or transfer of the Site or assets related to the Site. In such case, FL Technics will require that the new entity will follow this Privacy Policy with respect to the Registered Users' Personal Information. If your Personal Information is used contrary to this Privacy Policy, you will be given a prior notice as soon as possible.

DATA TRANSFER OUTSIDE THE EU AND EEA

Please note that in non-EEA states, personal data may be subject to less protection than within the EEA, but we carefully evaluate the conditions under which such data will be processed and stored after being transferred to the above-mentioned entities.

Please note that if the European Commission has determined that the third country, territory or one or more specified sectors in that third country or international organization concerned provides an adequate level of data protection, the transfer must take place in the same manner as in the EU.

In other cases, we take all necessary measures to ensure that your data is transferred to the recipient safely processing the data. The tools we use: a contract with a non-European recipient of personal data includes specific standard contractual clauses adopted by the European Commission (i.e., standardised and pre-approved model data protection clauses that allow controllers and processors to comply with

their obligations under EU data protection law) for the secure processing of the data. In certain cases, we ask for your consent to transfer your data outside the EEA.

RIGHTS GUARANTEED TO YOU

If you want to enforce any of your rights herein, please contact our Data Protection Officer by sending an email to privacy@fltechnics.com. Any request to exercise one of these rights will be assessed by us on a case-by-case basis. There may be circumstances in which we may not legally be required to comply with your request or because of relevant legal exemptions provided for in applicable data protection legislation. Upon receipt of your request, we may ask you to provide proof of identity, as well as any additional information required by us for the request, which we undertake to delete after identification.

Under certain circumstances, by law you may have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive an information on the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Right to object to processing of your personal information where we are relying on a legitimate interest and there is something about your situation, which makes you want to object to processing on this ground.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you are not satisfied with our answer you receive, you have the right to file a complaint to the supervisory authority in the relevant Member State of the European Union in which you have your habitual residence or place of work (please visit the European Data Protection Board website to find the contact details of supervisory authorities in each Member State: https://edpb.europa.eu/about-edpb/about-edpb/members_en).

In accordance with the GDPR, we will inform you of the action taken on your request within one month of receiving it. Please note that, in accordance with the GDPR, the processing of your request may be extended for an additional period of two months.

By refusing to comply with your requirement, we will clearly indicate the grounds for such refusal.

SOCIAL NETWORKS

We are active on several social media platforms. Our presence on X, YouTube, LinkedIn, Instagram and Facebook strengthens our online presence and visibility.

Facebook: <https://www.facebook.com/EASAPart147/>

Instagram: https://www.instagram.com/fltechnics_training/

LinkedIn: <https://lt.linkedin.com/company/fl-technics-online-training>

X (Twitter): <https://x.com/easapart147>

YouTube: https://www.youtube.com/c/147training_com

You can watch our videos, which we upload to the website or to our YouTube page. You can also follow links from our website to Facebook, Instagram LinkedIn, X and Youtube.

Your personal data provided on the social network is processed for the following purposes:

- communicate with our social network visitors;
- respond to visitor inquiries;
- obtaining statistical information;
- conducting customer surveys, marketing campaigns, market analysis, lotteries, competitions or similar actions or events;
- if necessary, defending the legitimate interests of the Company in institutions and in other cases.

Unless explicitly stated otherwise, the legal basis for data processing is Article 6 part 1 point (f) of the GDPR. Our legitimate interests are to be able to answer your messages or questions and analyze our availability on social networks, to present our products and services. To the extent that you wish to enter into a contractual relationship with us with your request, the legal basis for such processing is Article 6 part 1 point (b) of the GDPR.

If we intend to process your personal data for any other purpose not mentioned above, we will notify you prior to such processing.

As a kind note, when you visit social networks, your personal data is processed by a specific social network (e.g., “Facebook”, “Instagram”, “LinkedIn”, etc.), therefore the social media platforms are solely responsible for all data protection topics involving your user profile, to which we have no access. We start processing your personal data when you visit us on relevant social network.

We encourage you to read third-party privacy and cookies’ notices and contact social network administrators directly if you have any questions about how they use your personal data.

| Name of the social network and its Privacy Policy | Personal data we process | Personal data we process as joint data controllers |
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| Facebook | Your Facebook username, when you comment, react to the | We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our |

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| <p>You can read their privacy policy by clicking here: https://www.facebook.com/policy.php</p> | <p>publication, share posts, write us messages, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p> | <p>visitors come, age range, gender). We receive anonymous statistics from Facebook through their service. The data controllers' agreement can be found here: https://www.facebook.com/legal/terms/page_controller_addendum</p> |
| <p>Instagram</p> <p>You can read their privacy policy by clicking here: https://help.instagram.com/155833707900388</p> | <p>Your Instagram username, when you comment, react to the publication, share posts, share content in stories section, write us messages, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p> | <p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Instagram through their service. The data controllers' agreement can be found here: https://www.facebook.com/legal/terms/page_controller_addendum</p> |
| <p>LinkedIn</p> <p>You can read their privacy policy by clicking here: https://www.linkedin.com/legal/privacy-policy</p> | <p>Your LinkedIn username, when you comment, react to the publication, share posts, write us messages, Your location indicated on the personal account, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p> | <p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from LinkedIn through their service. The data controllers' agreement can be found here: https://www.linkedin.com/legal//dpa</p> |
| <p>X (Twitter)</p> <p>You can read their privacy policy by clicking here: https://twitter.com/en/privacy</p> | <p>Your X username, when you tweet, retweet (share) the tweet, quote, mention, write us messages, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p> | <p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from X through their service. The data controllers' agreement can be found here: https://gdpr.twitter.com/en/controller-to-controller-transfers.html</p> |

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| <p>YouTube</p> <p>You can read their privacy policy by clicking here: https://www.youtube.com/howyoutubeworks/our-commitments/protecting-user-data/</p> | <p>Your YouTube username, when you comment, interact with content.</p> | <p>If you are logged in with YouTube, you agree to YouTube terms of use, privacy and cookie policies and to YouTube processing of your personal data, at which we have no control over. If you are not registered with YouTube, YouTube may still perform statistical analysis of your personal data when you access our YouTube channel and provide us with anonymized statistics on this.</p> <p>We use statistical information. Processed data types:</p> <ul style="list-style-type: none"> - Inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers); - Content data (videos etc.); - Usage data (e.g. websites visited, interest in content, access times, video views, video likes, comments, purchases etc.), meta/communication data (e.g. device information, IP addresses). <p>Video Statistics:</p> <ul style="list-style-type: none"> - Number of subscribers and changes; - Watch time data (duration, stoppage time, retention rate); - Demographics (gender distribution, age, places of origin, use of devices etc.). <p>We receive anonymous statistics from Youtube through their service. The data controllers' agreement can be found here: https://business.safety.google/controllerterms/</p> |
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CONTACT US

If you have any request concerning the processing of your data or any question relating thereto, please email us at privacy@fltechnics.com, or contact us at Rodūnios kelias 2, 02189, Vilnius, the Republic of Lithuania.

HOW I LEARN ABOUT CHANGES TO THIS POLICY

This Privacy Policy is reviewed at least once every year. Once we update our Privacy Policy, we will notify you of the update by posting a notice on our website. In addition we will invite you to familiarize yourself with the updates upon logging into your account. If you login or use our content and/or services after such a notice was posted, we will assume that you agree to the new requirements specified in the update notice.

This Privacy Policy applies from the date it is posted on the Site.