

# ILS Privacy Notice and Cookies Policy

Last updated: August 26, 2020

## **A. Introduction**

This Privacy Notice (the “**Privacy Notice**”) describes how Inventory Locator Service, LLC and affiliates (“ILS”, “we”, “our” or “us”) handle personal information we obtain in connection with the operation of www.ilsmart.com and related sites linking to this Privacy Notice (the “**Services**”). ILS is an online market place serving the aviation, marine, and defense industries. We facilitate the sale of aviation and marine parts and related services by customers (the “**Sellers**”) by enabling them to create ads and list their inventory. Prospective buyers and other visitors to the Services (collectively, “**Buyers**”) use the Services to browse listings of aviation and marine parts and services, contact Sellers and share listings. We describe in this Privacy Notice how we use personal information we obtain in connection with the operation of the Services, with whom we may share it and how we protect it.

This Privacy Notice describes the privacy practices of ILS only and does not cover the practices of Sellers or others with whom you may engage through the Services. The Services are made available for informational and research purposes and is intended for users acting in a professional capacity.

Individuals in California, the European Union, Switzerland and the United Kingdom may have certain legal rights associated with our processing of their personal information. Please see the section “Your Rights Over Your Personal Information” below for more.

## **B. Personal Information We Obtain**

We obtain different types of personal information about Buyers and Sellers who use the Services, as described below. Certain features may not be available to individuals who do not provide the requested information.

### **1. Personal Information We Obtain Directly from Buyers**

When a Buyer visits the Services and completes a form (for example, to contact a Seller or share a listing with others) or contacts ILS to request an account for the Services, we ask for certain personal information, including:

- Contact and professional information (e.g., name, phone number, email address, postal address or mobile number, job title, employer or company information);
- Account information (e.g., username and password);
- Interests and preferences information (e.g., saved searches);
- Information Buyers give us about others, such as their contact information when they share our listings.

Please note that if you choose to interact with a Seller through our Services, we will provide the Seller with your personal information to facilitate the transaction you requested (including, your name and contact information). The Sellers are independent from us and are responsible for the handling and use of your personal information, including personal information that we may provide to them. Sellers are responsible for compliance with applicable laws, including privacy laws, and rights that you may have with respect to your personal information that such Sellers maintain. You should direct any questions or concerns with respect to your information directly to such Sellers.

### **2. Personal Information We Obtain Directly from Sellers**

When a Seller visits the Services and completes a form (for example, to place an ad or sign up to receive our communications) or creates an account, we ask for certain personal information, including:

- Contact and professional information (e.g., name, phone number, email address, postal address or mobile number, job title, employer or company information);
- Account information (e.g., username and password);
- Payment information related to the creation and/or posting of the listings;
- Transaction information (e.g., when you create an ad through the Services);
- Information Sellers give us about others, such as their contact information when they share our listings.

### **3. Data Automatically Collected from Buyers and Sellers on the Services (including by Cookies and Similar Technologies)**

We and our service providers may automatically log certain data when you access the Services from your web browser or mobile device, such as information about the number and frequency of visitors, technical information about browsers and devices used to access the Services, and information about crashes or other technical issues.

We may also use cookies and similar technologies to deliver, track and measure the performance and effectiveness of content (including listings) placed on the Services. Cookies and similar technologies on the Services may be served directly by ILS (referred to as 'first-party cookies') or by others such as advertisers and data analytics companies (referred to as 'third-party cookies'). Cookies and similar technologies are browser- and device-specific and may endure for different periods of time. Some are deleted automatically once you close your browser or exit the Services. These are sometimes referred to as 'session cookies'. Other cookies are 'persistent cookies', meaning that they remain on your device after your browser is closed. In addition, we and third parties may automatically collect certain information through cookies and similar technologies about your activities over time across the browsers and devices you use to access the Services as well as across third-party sites, apps or other media. These technologies may assign or collect a unique identifier on your browser or device, and may reside, among other places, on your computer or device, within webpages or mobile apps. We may use these technologies to administer, understand usage of and improve the Services.

See the section "Your Rights Over Your Personal Information" below to learn how you can opt out of cookies and similar technologies. You have the right to choose whether or not to accept certain cookies and similar technologies. However, if you choose to refuse or remove cookies and similar technologies, this could affect the availability and functionality the Services.

## **C. How We Use The Personal Information We Obtain and the Bases On Which We Use It**

We use personal information we obtain in connection with the operation of the Services as follows:

### **1. Personal Information of Buyers and Sellers**

We use the personal information of Buyers and Sellers we obtain through the Services for the following purposes:

- To identify and authenticate user accounts: We use account information of Buyers and Sellers to verify their identity and confirm access to the Services. This is so we can comply with our contractual obligations and to protect the Services and the personal information we obtain.
- To fulfill Buyers' and Sellers' requests and make the Services available: We process personal information to provide the services requested by the relevant Buyer or Seller (e.g., when a Seller creates an ad or a Buyer shares a listing). This is so we can provide the Services according to our contract with each Buyer or Seller.
- To improve the Services: We analyze information about how Buyers and Sellers use the Services to understand usage and provide an improved experience. This includes product testing and Services analytics. It is in our legitimate business interests to use the information provided to us for this purpose so we can understand and address any issues with the Site and improve our offerings.
- To communicate with Buyers and Sellers: We use personal information to communicate with Buyers and Sellers about their account or about listings. For example, if we are providing information about changes to our terms and conditions or if a Buyer or Seller contacts us with questions. It is in our legitimate interests that we are able to provide Buyers and Sellers with appropriate responses and notices about our Services.
- Marketing: We use Buyers' and Sellers' personal information to send promotional or marketing communications about ILS, the Services and our other offerings. We may also develop marketing segments. This helps us understand Buyers' and Sellers' interests and preferences and allows us to appropriately personalize the marketing messages we send. For example, we may develop an update for helicopter brokers about helicopters available for sale. It is in our legitimate interest to provide more relevant and interesting advertising messages.

Note that we use your payment information for limited purposes such as to process your transaction with us, to provide you with the requested products or services and to protect our rights or the rights of others.

### **2. Additional Uses for Personal Information**

In addition to the purposes listed in the above paragraphs, we use personal information we obtain about Buyers and Sellers for the following purposes:

- To protect our rights and the rights of others: We may use personal information we obtain to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or applicable terms of use.
- To comply with our obligations: We may process your personal information we obtain to comply with or enforce applicable industry and legal requirements (including legal process such as court orders, warrants or subpoenas and other requests from public and government authorities in the U.S. or other jurisdictions) and fulfilling our contractual obligations.

We may aggregate, de-identify and/or anonymize personal information in such a way that an individual may not reasonably be re-identified by us, and may use such aggregated or anonymized information for any purpose.

## **D. How We Share Personal Information**

We share personal information of Buyers and Sellers with:

- **Affiliates:** ILS is a subsidiary of CAMP Systems International Inc. We work closely with other businesses, companies and divisions within the CAMP Systems family of businesses. We may share certain personal information, such as contact information, business information, or transaction information with our affiliates to ensure consistency and accuracy of that personal information, or for marketing purposes, security, optimization of products and services, and internal business purposes (including reporting, auditing and compliance).
- **Service providers and business partners:** We share personal information we obtain with our service providers and business partners that perform services and business operations for us for the purposes set forth above. For example, we may partner with companies to process payments; optimize services; send newsletters, marketing messages and support communications; and conduct analytics.
- **Individuals that you select.** If you use a feature on the Services to share a listing or other content with others, we share your personal information with the recipients you selected.
- **Where required by law:** We may share personal information we obtain with law enforcement agencies, courts, other government authorities or other third parties where we believe necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- **In the context of a corporate transaction:** We reserve the right to transfer any of the personal information we have about you to proceed with the consideration, negotiation, or completion of a sale or transfer of all or a portion of our business or assets to a third party, such as in the event of a merger, acquisition or other disposition, or in connection with a bankruptcy reorganization, dissolution, or liquidation. Should such a sale or transfer occur, we will use reasonable efforts to obligate the entity to which we transfer your personal information to use it in a manner that is consistent with this Privacy Notice.
- **With your consent or otherwise at your direction:** We may share your personal information where you consent to or otherwise direct such sharing.

## **E. Your Rights Over Your Personal Information**

### **Email Marketing Opt-Out**

You can opt out of receiving marketing and promotional communications from us by clicking in the unsubscribe link in the relevant email.

### **Analytics Opt-Outs**

The Services uses analytics to help improve both the user experience and functionality, including third-party analytics provided by Google Analytics. To opt-out of Google Analytics on your device or browser, please visit <https://tools.google.com/dlpage/gaoptout> and follow the instructions.

### **Do Not Track**

ILS does not currently take steps to respond to browsers “Do Not Track” signals as no uniform standard to respond to such signals has been developed at this time.

### **Additional Information for California Residents**

Under California law, specific disclosures are required, and Buyers and Sellers who are California residents may have additional rights regarding their personal information. Please review this section to learn more.

Shine the Light: Residents of California who use the Services primarily for personal, family or household purposes and provided us with their personal information may request a list of third parties to which certain personal information (as defined by applicable California law) obtained through the Services, as applicable, was disclosed by AMSTAT during the preceding year for those third parties' direct marketing purposes. If you are a California resident and want such a list, please contact us at Office of General Counsel, Attn: ILS Privacy, 300 West 57th Street, New York, NY 10019. For all requests, you must put the statement "Your California Privacy Rights" in the body of your request, as well as your name, street address, city, state, and zip code. In your request, you need to attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via the telephone, email, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Your California Consumer Privacy Act of 2018 ("CCPA") Rights: Residents of California who are "consumers" may have the following rights with regards to information collected by ILS in connection with the operation of the Services used for their own personal, family or household purposes:

- a) Right to access your personal information. You may request to access the categories and specific pieces of personal information ILS collected about you.
- b) Right to deletion. Subject to certain exceptions, you may ask us to delete the personal information ILS collected about you.
- c) Right to disclosure. You may request to receive additional details about the sources from which we collect information, the reasons we collect and share information, and the types of third parties with which we share the personal information.
- d) Right to opt out of sales. Under CCPA, certain types of sharing of personal information may constitute a "sale" of your personal information. You have a right to request that we do not sell your personal information to third parties, for such third parties' own commercial purposes, on a going forward basis. ILS currently does not share personal information in ways that may constitute a "sale" under CCPA.
- e) Right to be free from discrimination. You may exercise any of the above rights without fear of being denied goods or services.

Please contact us with your request by email at [custsppt@ilsmart.com](mailto:custsppt@ilsmart.com). For such requests, please put the statement "California CCPA Rights" in the body of your email, as well as your full name and email address and specify the CCPA right you wish to exercise at this time.

Minors: ILS does not knowingly collect or disclose personal information of minors under the age of 16, without affirmative authorization.

### **Additional Information for European Visitors**

You may have certain rights regarding the personal information we hold about you. These include the rights to access, correct, delete, restrict or object to our use of, or receive a portable copy in a usable electronic format of your personal information.

If you would like to update the personal information we hold about you, please contact us at the contact information set forth below. If you reside in the European Union or Switzerland and we process your information on the basis of your consent, you can withdraw this consent at any time.

Please note that we may require additional information from you in order to honor your requests.

If you would like to discuss or exercise any rights you may have under law, please contact us at the contact information set forth in the "Contact Us" section below. We are committed to working with you to obtain a fair resolution in the event you have a complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to a data protection authority.

## **F. Information Security and Storage**

We implement physical, technical, and organizational security measures designed to safeguard the personal information we process through the Services. However, no information system can be 100% secure, so we cannot

guarantee the absolute security of your information.

We retain Buyers' and Sellers' personal information for as long as we have a relationship. We also retain the personal information of Buyers and Sellers to preserve historical records regarding aviation and marine parts and services ownership and affiliations. When deciding how long to keep personal information after our relationship with the relevant Buyer or Seller has ended or for historical purposes, we take into account our legal obligations and our legitimate interest in maintaining historical records. We may also retain records to investigate or defend against potential legal claims.

## **G. International Data Transfer**

We store and process personal information in the United States and India, which may not provide the same level of protection for personal information as the laws of your home country.

We implement appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to provide adequate protections for your personal information when we transfer it between countries. For more information about these safeguards, please contact us at the contact information set forth below.

## **H. Children's Privacy Rights**

The Services are not intended for use by children, especially those under the age of 13.

## **I. Changes to this Privacy Notice**

We may update this Privacy Notice from time to time to reflect changes in our privacy practices or applicable laws. In accordance with applicable law, we may make such changes without prior notice. We will publish the updated version on the Services and indicate at the top of the Privacy Notice when it was most recently updated. Your use of the Services will be governed by the current version of this Privacy Notice.

## **J. Contact Us**

ILS is the controller responsible for the personal information we collect and process. If you have questions or concerns regarding the way in which your personal information has been used, please contact us at [custspt@ilsmart.com](mailto:custspt@ilsmart.com) or by postal mail at:

Inventory Locator Service, LLC  
Attn: Customer Support  
8001 Centerview Parkway  
Memphis, TN 38018

Please indicate in your correspondence that your request relates to ILS.