

DATA PROTECTION POLICY

PERSONAL DATA FROM WEBSITE

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1. WHO WE ARE

This Privacy Policy explains how AXIS Aviation AG processes personal data collected through the website axis-aviation.com.

AXIS Aviation AG, a company incorporated under the laws of Switzerland with its registered office at Seefeldstrasse 283, 8008 Zürich, Switzerland ("AXIS Aviation", "we", "us", or "our"), is the data controller responsible for the processing of personal data described in this Policy.

Although AXIS Aviation AG is established in Switzerland and is therefore not directly subject to the General Data Protection Regulation (Regulation (EU) 2016/679, the "GDPR") by reason of its establishment, this Policy applies the GDPR in full to processing carried out in connection with the offering of services to, and the monitoring of the behaviour of, data subjects in the European Union (Article 3(2) GDPR). Processing of personal data of data subjects located in Switzerland is governed by the Swiss Federal Act on Data Protection of 25 September 2020 ("nFADP").

EU Representative (Article 27 GDPR)

AXIS Aviation AG has designated AXIS Aviation Austria GmbH, Wagramer Strasse 19, 1220 Vienna, Austria, as its representative in the Union for the purposes of Article 27 GDPR. Data subjects in the European Union may contact the EU Representative at legal@axis-aviation.com on all matters relating to the processing of their personal data and the exercise of their rights under the GDPR.

2. SCOPE OF THIS POLICY

This Policy applies to personal data collected through axis-aviation.com and, to the extent accessible to website visitors, the login interface at platform.axis-aviation.com.

This Policy does not apply to:

- / processing carried out within the platform itself after authenticated login by aircraft owners, crew, or other operational users, which is governed by a separate Platform Privacy Notice;
- / processing in the context of contractual relationships with clients, suppliers, employees, or candidates, which is governed by separate notices and contracts;
- / third-party websites linked to from this website, which are governed by the privacy notices of their respective operators.

3. PERSONAL DATA WE COLLECT

3.1 DATA YOU PROVIDE TO US

When you contact us through the website or apply for a position via the careers page, we collect the personal data you provide in the relevant form, which may include:

- / identification and contact data: name, email address, telephone number, postal address;
- / professional data: employer, job title, country of operation;
- / application data: curriculum vitae, cover letter, qualifications, references, and any other information you choose to include in your application;
- / the content of your message or enquiry.



3.2 DATA WE COLLECT AUTOMATICALLY

When you visit the website, we automatically collect technical data necessary for the operation, security, and performance of the website, including:

- / device and connection data: IP address, browser type and version, operating system, device type, screen resolution, language settings;
- / usage data: pages visited, time and duration of visit, referrer URL, navigation paths, interactions with website elements;
- / data collected through cookies and similar technologies, as described in §7 below.

3.3 DATA WE DO NOT KNOWINGLY COLLECT

We do not knowingly collect special categories of personal data within the meaning of Article 9 GDPR through the website.

4. PURPOSES FOR WHICH WE PROCESS YOUR DATA

We process your personal data for the following purposes:

- / to operate, secure, and improve the website, including protecting it against fraud, abuse, and technical disruption;
- / to respond to enquiries you submit through the contact form and to manage related correspondence;
- / to evaluate and process applications submitted through the careers section;
- / to measure website performance and audience behaviour in aggregate, where you have consented to analytics cookies;
- / to deliver targeted advertising and measure its effectiveness, where you have consented to advertising cookies;
- / to comply with our legal obligations, in particular those arising under data protection, tax, and aviation regulatory law;
- / to establish, exercise, or defend legal claims.

5. RECIPIENTS OF YOUR PERSONAL DATA

We share personal data with the following categories of recipients, each engaged under contractual terms incorporating the safeguards required by Article 28 GDPR (and equivalent provisions of the nFADP) where they act as processors on our behalf:

- / website hosting and infrastructure providers — Kinsta Inc. (using Google Cloud Platform infrastructure located in Frankfurt, Germany);
- / analytics and advertising providers — Google LLC (in respect of Google Analytics 4 and Google Ads, subject to your consent);
- / consent management providers — Complianz B.V. (in respect of the cookie consent banner);



- / customer relationship management providers — Pipedrive OÜ (in respect of business enquiries that are followed up by our commercial team);
- / professional advisors — lawyers, auditors, and consultants engaged on our behalf, under appropriate confidentiality obligations;
- / competent authorities, regulators, and courts — where we are required by law to disclose personal data or where disclosure is necessary to establish, exercise, or defend legal claims.

6. LEGAL BASES FOR PROCESSING

We process personal data on the legal bases set out in the table below. Where we rely on our legitimate interests, we have conducted a balancing assessment and have concluded that those interests are not overridden by your interests, rights, and freedoms.

Processing activity	Legal basis (GDPR)	Legal basis (nFADP)
Operation, security, and integrity of the website (incl. server logs, Cloudflare protection)	Art. 6(1)(f) — legitimate interest in providing a secure and functional website	Art. 31(1) and (2)(a) nFADP — overriding private interest in network security
Contact form: handling of enquiries	Art. 6(1)(b) — pre-contractual steps; or Art. 6(1)(f) for general enquiries	Art. 31(2)(a) nFADP — contract performance or overriding private interest
Careers form: processing of applications	Art. 6(1)(b) — pre-contractual steps at the request of the candidate; Art. 88 GDPR via §27 BDSG-equivalent where applicable	Art. 31(2)(a) nFADP — pre-contractual steps
Strictly necessary cookies (Cloudflare, Complianz consent record, session)	Art. 6(1)(f) GDPR; ePrivacy Dir. Art. 5(3) — strictly necessary exemption	Art. 31(1) nFADP
Analytics cookies (Google Analytics 4)	Art. 6(1)(a) — your consent; ePrivacy Dir. Art. 5(3)	Art. 6(6) nFADP — your consent
Advertising cookies (Google Ads, conversion tracking)	Art. 6(1)(a) — your consent; ePrivacy Dir. Art. 5(3)	Art. 6(6) nFADP — your consent
Compliance with legal obligations	Art. 6(1)(c) GDPR	Art. 31(1) nFADP
Establishing, exercising, or defending legal claims	Art. 6(1)(f) GDPR	Art. 31(1) and (2)(d) nFADP

7. COOKIES AND SIMILAR TECHNOLOGIES

The website uses cookies and similar technologies. A cookie is a small text file stored on your device when you visit a website. We use cookies to operate the website, to remember your preferences (including your consent choices) and to measure audience behaviour.

When you first visit the website, our consent management platform (Complianz) presents a banner allowing you to accept or refuse non-essential cookies, and to adjust your preferences by category. You may change or withdraw your consent at any time by clicking the cookie



preferences link in the website footer.

7.1 CATEGORIES OF COOKIES

Category	Examples	Legal basis	Retention
Strictly necessary	Cloudflare __cf_bm; Complianz complz_* (7 cookies)	Necessary — no consent required	Session to 1 year
Analytics (consent-based)	Google Analytics 4 _ga, _ga_<id>, _gid, _gat	Your consent	Up to 14 months
Advertising (consent-based)	Google Ads conversion (_gcl_a, IDE, NID and similar)	Your consent	Up to 13 months
Other Google services	YouTube embed and Google service cookies (set only on pages that load Google content)	Your consent (non-essential)	Varies

A complete and up-to-date list of cookies set by the website, including the name, provider, purpose, and duration of each cookie, is available through the cookie preferences interface accessible from the website footer.

8. INTERNATIONAL TRANSFERS

Some of the recipients listed in §5 are established outside Switzerland and the European Economic Area, including in the United States. Where we transfer personal data to such recipients, we ensure that an appropriate transfer mechanism is in place, in accordance with Chapter V GDPR and Articles 16 and 17 nFADP.

The transfer mechanisms we rely on include:

- / for transfers to the United States: the EU–U.S. Data Privacy Framework (Commission Implementing Decision (EU) 2023/1795) and the Swiss–U.S. Data Privacy Framework, where the recipient is certified under the relevant Framework;
- / for other transfers to third countries: the Standard Contractual Clauses adopted by the European Commission under Implementing Decision (EU) 2021/914, together with such supplementary measures (technical, contractual, or organisational) as may be required following a transfer impact assessment;
- / for transfers from Switzerland: the corresponding mechanisms recognised by the Federal Data Protection and Information Commissioner.

You may obtain a copy of the safeguards relied on for a specific transfer by contacting us at legal@axis-aviation.com.

9. RETENTION OF PERSONAL DATA

We retain personal data only for as long as necessary for the purposes for which it was collected, in accordance with the following criteria:



Data category	Retention period	Justification
Contact form enquiries	12 months from last meaningful interaction	Operational follow-up; defence of claims under Swiss Code of Obligations Art. 127
Job applications (unsuccessful)	6 months from the conclusion of the recruitment process	Defence of equal-treatment claims; possible future opportunities (if applicant consents to extended retention)
Job applications (successful)	Transferred to the employee file and retained per Swiss/Austrian employment law	Statutory employment record-keeping
Server logs (technical)	30 days for routine logs; up to 12 months for security-incident logs	Network and information security
Cookie consent records (Complianz)	12 months	Demonstrate consent under Art. 7(1) GDPR; Art. 6(6) nFADP
Analytics data (GA4)	Up to 14 months in identifiable form	Aggregate audience measurement; GA4 default
CRM records (Pipedrive)	Duration of the commercial relationship plus 7 years thereafter	Swiss Code of Obligations Art. 962 (commercial books)

10. YOUR RIGHTS

Subject to the conditions set out in the GDPR and the nFADP, you have the following rights in relation to your personal data:

- / right of access (Art. 15 GDPR; Art. 25 nFADP) — to obtain confirmation that we are processing your data and a copy of that data;
- / right to rectification (Art. 16 GDPR; Art. 32(1) nFADP) — to have inaccurate or incomplete data corrected;
- / right to erasure (Art. 17 GDPR; Art. 32(2)(c) nFADP) — to have your data deleted in the circumstances specified by law;
- / right to restriction of processing (Art. 18 GDPR) — to limit the processing of your data in certain situations;
- / right to data portability (Art. 20 GDPR; Art. 28 nFADP) — to receive your data in a structured, commonly used, machine-readable format, where processing is based on consent or contract and is carried out by automated means;
- / right to object (Art. 21 GDPR; Art. 30(2)(b) nFADP) — to object, at any time and on grounds relating to your particular situation, to processing based on our legitimate interests; and, in respect of direct marketing, to object absolutely;
- / right to withdraw consent (Art. 7(3) GDPR; Art. 6(6) nFADP) — where processing is based on your consent, to withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal;



- / right not to be subject to a decision based solely on automated processing (Art. 22 GDPR; Art. 21 nFADP) — we do not currently carry out such processing in connection with the website;
- / right to lodge a complaint with a supervisory authority (Art. 77 GDPR; Art. 49 nFADP) — see §11 below.

To exercise any of these rights, please contact us at privacy@axis-aviation.com. We will respond to your request without undue delay and in any event within one month of receipt, in accordance with Article 12(3) GDPR. We may extend that period by two further months where necessary, taking into account the complexity and number of the requests, and will inform you of any such extension within one month of receipt of the request.

We do not charge a fee for the exercise of your rights, except in the limited circumstances permitted by Article 12(5) GDPR (manifestly unfounded or excessive requests).

11. SUPERVISORY AUTHORITIES

You have the right to lodge a complaint with a competent supervisory authority. Without prejudice to your right to lodge a complaint with any other supervisory authority, the principal authorities are:

Switzerland — Federal Data Protection and Information Commissioner (FDPIC / EDÖB), Feldeggweg 1, 3003 Berne, Switzerland (www.edoeb.admin.ch).

Austria (via our EU Representative) — Österreichische Datenschutzbehörde (DSB), Barichgasse 40-42, 1030 Vienna, Austria (www.dsb.gv.at).

If you reside in another EU/EEA Member State, you may also lodge a complaint with your local supervisory authority. A list of EU/EEA supervisory authorities is maintained by the European Data Protection Board at edpb.europa.eu.

12. SECURITY AND BREACH NOTIFICATION

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing, including measures to prevent unauthorised access, unlawful processing, accidental loss, destruction, and damage. These measures include encryption in transit (TLS), access controls based on the principle of least privilege, regular review of access rights, security logging, vulnerability monitoring, and staff training.

In the event of a personal data breach likely to result in a risk to the rights and freedoms of natural persons, we will notify the competent supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of the breach (Article 33 GDPR). Where the breach is likely to result in a high risk to the rights and freedoms of natural persons, we will also notify the affected data subjects without undue delay (Article 34 GDPR). Equivalent notification obligations apply under Article 24 nFADP.

13. CONTACT DETAILS AND DATA PROTECTION OFFICER

For any questions about this Policy or about our processing of your personal data, or to exercise any of the rights set out in §10, please contact us:

By post: AXIS Aviation AG, Attn: Data Protection, Seefeldstrasse 283, 8008 Zürich, Switzerland.



By email: legal@axis-aviation.com.

14. CHILDREN'S DATA

The website is directed at a professional audience and is not intended for use by children. We do not knowingly collect personal data from children under the age of 16 (or under the age of 14 where the data subject is located in Austria, in accordance with §4(4) DSG). If you become aware that a child has provided personal data to us, please contact us at legal@axis-aviation.com and we will take steps to delete that data.

15. CHANGES TO THIS POLICY

We may amend this Policy from time to time. The version in force is the version published at axis-aviation.com/privacy with the most recent revision date. Where a change is material — for example, where we introduce a new processing purpose or rely on a new legal basis — we will draw your attention to the change through a notice on the website or, where appropriate and feasible, by direct communication.

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