Duncan Aviation Privacy and Cookie Statement

Thank you for reviewing the Duncan Aviation Privacy and Cookie Statement ("<u>Statement</u>"). Duncan Aviation, Inc. (herein "<u>Duncan</u>") is sensitive to the issue of confidentiality in online interactions and is committed to protecting individual privacy across our range of websites, mobile applications, products, solutions, and services (collectively our "<u>Services</u>" or "<u>Duncan</u>").

This Statement applies to visitors and users of Duncan Services that link to this Statement. Some of our services adopt different privacy statements, or privacy notices that supplement this Statement, to better fit transactions taking place on those Duncan Services or in accordance with local privacy laws. If a Service or brand has its own privacy statement or a supplementary notice, the provisions of that statement or supplementary notice will take priority if conflicting with this Statement.

If you are a California resident, you may be entitled to additional rights over your personal information. For more information about those rights and how to exercise them, please see our Privacy Notice for California Residents **here**, which is incorporated by reference into this policy.

For your convenience, Duncan Services may enable purchases, subscriptions, or use of other products and online services from other entities with different privacy practices, and the personal information collected in those instances will be governed by the respective privacy policies or statements of those other entities.

Collection and use of personal information Collection and use of location data Collection and use of automated processing Information collected automatically Cookies and tracers Third-party cookies and tracers Interest-based advertising Cross-device tracking Organizational services data Disclosure of personal information Location of data processing Retention of personal information Security of personal information Children's privacy Exercise of rights per the European Union General Data Protection Regulation Corporate changes Contact us

Collection and use of personal information

Duncan Services may collect personal information from and about individuals for a variety of purposes. In some cases, Duncan requests personal information from you, or from your employer in the case of organizational Services. In other cases, we obtain personal information by noting how you and the devices you use interact with our Services. Examples of personal information include:

- first and last names
- job titles or roles
- phone numbers
- e-mail addresses
- shipping and billing addresses
- login credentials
- passport or government identification information
- country of residence
- web statistics and use

Duncan uses your personal information in a variety of ways, depending on how you interact with Duncan Services, including to:

- maintain and provide you with Services
- provide customer support, including online chat features provided by Duncan Services
- fulfill underlying transactions on our Services
- allow access to account information and Service features
- respond to your questions or instructions concerning the Services

- deliver confirmations, account information, notifications, and similar operational communications
- improve your user experience and the quality of our products and Services
- market and advertise our products and services
- enable you to share information with social networks and to interact with Duncan on social media sites
- maintain the integrity of our network and address security issues
- investigate or take action regarding violations or suspected violations of law or our terms
- comply with legal and/or regulatory requirements

We and our service providers also use the information you provide to send you communications, including promotional messages about Duncan and topics of interest, via email, postal mail, fax, SMS and phone, as permitted by local law and subject to your contact preferences. In the even that any of our promotional communications are not in line with your interests, you are able to opt out of receiving them by following the instructions included in each communication.

You can choose to follow our company on social media, or log in to some Duncan Services using social media account credentials. Your use of social media features could result in the collection or sharing of information about you, depending on the feature. The details we receive depends on your social network account privacy settings. We encourage you to review the privacy practices and settings of the social media sites you use to make sure you understand the personal information that may be collected, used, and shared by those sites.

We acquire data from third-party sources that are either publicly or commercially available. This information includes personal information such as your name, address, email address, preferences, interests, and demographic data. We combine personal information collected through our Services with other information that we or third parties collect about you in other contexts, such as our communications with you via email or phone, or your customer service records. We treat such combined information as personal information and protect it in accordance with this Statement.

Collection and use of location data

Certain Duncan applications may use geolocation features (GPS or network-based) to support your use of location-based tools such as airport/map views, city code searches and other features, as well as to improve Duncan applications. When you use Duncan Services, we may collect and process information about your pinpointed location, after obtaining consent as required by local law. We use various technologies to determine location, including IP address, GPS, and other sensors that, for example, provide us with information on nearby devices, Wi-Fi access points, and cell towers. Location data is used in accordance with <u>Collection and use of personal information</u>, and disclosed in accordance with <u>Disclosure of personal information</u>. You are able to withdraw your permission for Duncan to acquire pinpointed location information from your

device through your device settings, although Duncan does not control this process. If your device is owned by your organization, your ability to withdraw your permission for pinpointing location information will depend on your organization's policies.

Collection and use of automated processing

Duncan may make certain decisions based solely on automated processing in a variety of ways (including through the use of machine learning and artificial intelligence) to support and improve the Services. Duncan does not, however, subject your personal information to automated decision making that produces legal or similarly significant effects.

Information collected automatically

Duncan uses various digital analytics tools to collect data for metrics, fraud prevention, and service improvement purposes and to customize the content and layout of our pages for each individual visitor. Each time you visit Duncan Services, we may automatically collect certain types of information. Some examples of information automatically collected are as follows:

- Your IP address and approximate physical location, MAC address, browser type, operating system, device-identifying information, type of computer or device, and type of Web browser software, the specific webpages visited during your connection, and the domain name from which you accessed the Duncan Services.
- Information about your browsing behavior including through the use of session replays / screen capture tools, such as the date and time you visit the Duncan Services, the areas or pages of the Duncan Services that you visit, the amount of time you spend viewing the Duncan Services, the number of times you return to the Duncan Services and other clickstream data.
- We may use "cookies" of different types to recognize your device. A cookie is a small text file that a website, online application, or e-mail may save to your Web browser and/or your device memory for use in subsequent visits to the Site or other sites. See below for more information on cookies.
- We may use web beacons, match scripts, pixel tags or similar technologies that allow us to know if a particular web page was visited, an e-mail opened, or links in the email used. In some instances, these technologies may allow us to match activities with particular users.

When you visit Duncan Services and you have not otherwise identified yourself (e.g., via registration with a Duncan Service), our web servers automatically recognize your domain name, but not your e-mail address. We may also collect firmographic information about your company, if you are visiting Duncan Services from your company domain. We collect the domain name and monitor general site use and traffic patterns to improve the Services that we offer.

Cookies and tracers

Cookies are currently the best way to effectively identify unique website visitors and understand how they navigate our Services. Cookies are small data files placed on your device by a website when you visit. Duncan uses cookies set by us or other companies for tracking purposes or to make our Services easier to use and tailored for individual users. Like many websites, we do not currently respond to "do not track" browser headers except where legally required. But with most Web browsers, you can take steps to limit tracking by erasing cookies from your device and by setting your browser to block all cookies or warn you before a cookie is stored. Cookies offer enhanced functionality to the user, but whether you allow a cookie to be placed on your device is up to you.

Duncan uses, and permits service providers to use, tracking scripts or "tracers" and web beacons that recognize a unique identifier from a cookie placed on your device by another website. For example, we use a tracer to determine whether you visit our pages after visiting a site where we placed a banner ad. We also use these technologies to compile information about your website usage and your interaction with email or other communications, to measure performance, and to provide content and ads that are more relevant to you. A web beacon is typically a transparent graphic image that can be embedded in online content, videos, and emails, and can allow a server to read certain types of information from your device, know when you have viewed the beacon, and the IP address of your device. For example, we include web beacons in our promotional email messages or newsletters to determine whether our messages have been opened or interacted with and whether our mailing tools are working properly.

While our cookie names will change over the course of time, they generally fall into the following categories:

Categories Service Features and Processes	Examples These cookies help us deliver Services, such as maintaining your shopping cart, processing payments, navigating around Services, and using live chat to interact with customer service representatives. Some of these cookies are placed on your device by a third party with which we contract to provide certain services. Without these cookies, our Services cannot function properly.
Service Preferences	These cookies allow our Services to remember information that changes the way the Service behaves or looks, such as your preferred language or the region you are in. These cookies can also assist you in changing text size, font, and other parts of web pages that you can personalize. Without these cookies, our Services cannot function properly.

Service Improvement	These cookies help us improve our Services and your browsing experience. Blocking or deleting these cookies will not impact Service functionality. For details and to opt out, see <u>Cookies and</u> tracers.
Analytics	These cookies help us understand how visitors engage with our Services through collection of usage statistics. Examples of the types of data collected include IP addresses, referral pages, date and time of Service access, and Service visited. Some of these cookies are placed on your device by a third party with which we contract to provide certain services. Blocking or deleting these cookies will not impact Service functionality. For details and to opt out, see <u>Third-party</u> cookies and tracers.
Advertising and Remarketing	These cookies are used to understand and deliver ads, make them more relevant to you, and analyze the effectiveness of our advertising programs. They use the fact that you visited our Services to target online ads for Duncan Services to you on non-Duncan websites. Some of these cookies are placed on your device by a third party with which we contract to provide certain services. Blocking or deleting these cookies will not impact Service functionality. For details and to opt out, see Interest-based advertising.
Social Features	These cookies allow you to more easily share our Service content on social networks, or share your comments with other Service visitors. Some of these cookies are placed on your device by a third party with which we contract to provide certain services. Blocking or deleting these cookies will not impact Service functionality. For details and to opt out, see <u>Third-party cookies</u> and tracers.
Security and Authentication	These cookies are used to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorized parties. Without these cookies, certain Services features cannot function properly.

Third-party cookies and tracers

Duncan Services often contain cookies or similar technologies from third-party providers that help us compile statistics about the effectiveness of our promotional campaigns, perform analytics, enable social networking features, and other operations. These technologies enable the third-party providers to set or read their own cookies or other identifiers on your device, through which they can collect information about your online activities across the Services and other, unaffiliated devices, applications, websites, or services. You can opt out of data collection or use by some of these third-party providers by visiting the following links:

• http://tools.google.com/dlpage/gaoptout(opens in a new tab)

- http://www.adobe.com/privacy/opt-out.html (opens in a new tab)
- <u>http://www.addthis.com/privacy/opt-out(opens in a new tab)</u>
- <u>https://www.scorecardresearch.com/optout.aspx(opens in a new tab)</u>

Interest-based advertising

Duncan also enables cookies and third-party tracking mechanisms to collect your information for use in interest-based advertising. For example, third parties use the fact that you visited our Services to target online ads for Duncan Services to you on non-Duncan websites. In addition, our third-party advertising networks use information about your use of our Services to help target non-Duncan advertisements based on your online behavior in general. Learn more about interest-based advertising, or opt out of the practice, by visiting the following links:

- http://www.networkadvertising.org/choices(opens in a new tab)
- http://www.aboutads.info/choices(opens in a new tab)
- <u>https://www.google.com/settings/ads/plugin(opens in a new tab)</u>

For more information on opting out of mobile interest-based advertising, please visit the following link:

• https://www.aboutads.info/appchoices(opens in a new tab)

Cross-device tracking

Data collected from a particular browser, app, or device can be used with a linked computer or device. For example, we or our third-party service providers display ads to you on your laptop or other device based on the fact that you visited Duncan Services on your smartphone. You can opt out of cross-device tracking on each of your browsers and devices by using the links provided above (see <u>Interest-based advertising</u>). Please note that the opt-out will apply only to the specific browser or device from which you opt out, and you need to opt out separately on all of your browsers and devices.

Organizational services data

Many Duncan Services are intended for use by organizations. If you interact with our Services through an account provided by your organization, the organization typically administers your Services account, and controls and accesses your data, including the contents of files stored on our Services. Duncan is not responsible for the privacy or security practices of organizational customers, which differ from those set forth in this Statement, as they are administered by these organizations. The types of data processed by our Services include the following:

Date type Customer Data	Description Data, including traveler profiles, maintenance records, and other text or image files provided to Duncan by you or your organization through use of our Services. Customer Data is used to provide the Services, including compatible related purposes. For example, we use Customer Data to provide a personalized experience, improve service reliability, combat spam or other malware, or to improve features and functionality of the Services.
	Duncan processes Customer Data under the direction of organizational customers, and has no direct control or ownership of the Customer Data it processes. The organizations are responsible for complying with any regulations or laws that require providing notice, disclosure and/or obtaining consent prior to transferring Customer Data to Duncan for processing purposes.
Account Data	We will not disclose Customer Data outside of Duncan except as a customer directs, as described here or in relevant agreement(s), as required by law, or in response to legitimate governmental requests. Should law enforcement contact Duncan with a lawful demand for Customer Data, Duncan will attempt to redirect the law enforcement agency to request that data directly from the organizational customer. In support of the above, Duncan provides basic organizational contact information to the third party. Information provided to Duncan during sign-up, purchase, or administration of the organizational Services. Account Data includes the names, addresses, phone numbers, and email addresses you provide, as well as aggregated usage information related to your organization's accounts and administrative data. We use Account Data to provide the Services, complete transactions, service the account, and detect and prevent fraud.
	We use Account Data to contact your organization to provide information about accounts, subscriptions, billing, and updates to the Services, including information about new features, security or other technical issues. We also contact your organization regarding government or other third-party inquiries we receive regarding its use of the Services. You or your organization will not be able to unsubscribe from these non-promotional communications. Subject to contact preferences, we also send promotional communications about our products and services. You can manage your contact preferences in your account profile or by contacting your Duncan sales representative.

	With limited exceptions, Duncan processes Account Data under the direction of its organizational customers, and has no direct control or ownership of the personal information it processes. The organizations are responsible for complying with any regulations or laws that require providing notice, disclosure and/or obtaining consent prior to transferring Account Data to Duncan for processing purposes.
Payment Data	We share Account Data or Payment Data with third parties for purposes of fraud prevention, to process payment transactions, or to enable a requested purchase, subscription, or use of a third-party offering. Includes payment instrument number (e.g., credit card), name and billing address, the security code associated with the payment instrument, organizational tax ID, and other financial data. Organizations that make purchases will be asked to provide Payment Data, which we use to complete transactions, as well as to detect and prevent fraud. When you provide Payment Data online, we will store that data to help you complete future transactions.
Support Data	You can update or remove Payment Data associated with your organization's account by logging in to individual Services or by contacting customer support. After you close an account or remove Payment Data, however, Duncan will retain that information for as long as reasonably necessary to complete transactions, to comply with Duncan's legal and reporting requirements, and to detect and prevent fraud. Information we collect when you contact or engage Duncan for support. It includes information you submit in a support request, or about the condition of the device and the app where an error may have occurred, including error-tracking files. We use Support Data to resolve your support incident.
Telemetry Data	In addition to using Support Data to resolve your support incident, we also use it to operate, improve and personalize the products and services we offer. Phone conversations, online chat sessions, or remote troubleshooting sessions with support professionals are recorded and/or monitored. Following a support incident, we typically send you a survey about your experience. Information we collect that tells us how our Services are performing and being used. It includes information about when and how long a Service is used, which features are accessed, and the physical location of devices used to access our Services. It also includes information about hardware,

software, and other details gathered related to usage, authentication, diagnostics, errors encountered, or the condition of the device and the Service when an error occurred.

In addition to using Telemetry Data to resolve common incidents related to our Services, we also use it to operate, improve and personalize the Services we offer.

Disclosure of personal information

When you provide personal information to Duncan or its entities and brands, we share that information with other Duncan entities and brands to provide a more unified customer experience. Certain Services must disclose information to third parties assisting us in processing a transaction requested by you (e.g., credit card service providers). In addition, Duncan hires service providers to perform work on its behalf. Any such service providers will be permitted to obtain data from the Services only to deliver the services Duncan has retained them to provide and will be prohibited from using data for any other purpose. Duncan discloses personal information to these service providers for the purposes identified in <u>Collection and use of personal information</u>, including to send promotional communications to you via email, postal mail, fax, SMS and phone as permitted by local law and subject to your contact preferences. In order to cooperate with legitimate governmental requests, subpoenas, or court orders, to protect Duncan and/or Duncan's systems and customers, to establish, protect, or exercise our legal rights or defend against legal claims, or to ensure the integrity and operation of Duncan and/or Duncan business and systems, Duncan accesses and discloses the necessary and appropriate information under the circumstances.

Location of data processing

Personal information that Duncan processes is transferred to, and stored and processed in the United States. The data protection laws in the United States are different from, and could be more or less stringent than, those in your country of residence. We take steps to ensure that the data we collect under this Statement is processed according to the provisions of this Statement and the requirements of applicable law wherever the data is located.

Retention of personal information

Duncan stores your personal information for as long as you use the Services, and no longer than is necessary for the purposes for which the information was collected, or for which it is legitimately further processed. Thereafter, Duncan retains personal information for a period of time set forth in its corporate retention schedules. In the case of organizational Services data, Duncan retains personal information according to the timeframes set forth in relevant customer agreements, or in lieu of an agreement, for as long as a legitimate business purpose exists.

Security of personal information

Duncan is committed to helping protect the security of your information. We have implemented and will maintain appropriate technical and organizational measures to protect your information against accidental loss, destruction or alteration, unauthorized disclosure or access, or unlawful destruction. The Internet, however, cannot be guaranteed to be 100% secure, and we cannot ensure the security of any personal information provided to us.

Children's privacy

In general, Duncan does not knowingly collect, use or disclose personal information from children, as defined by local law. If you believe that we have collected personal information about a child, please <u>Contact Us</u> so that we can delete the information. Additionally, please <u>Contact Us</u> to request removal of content or information that was posted to our Services when the registered user was under the age of 18.

Exercise of rights per the European Union General Data Protection Regulation

The following table is provided to facilitate the rights of individuals under Chapter III of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal information (also called personal data) and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) also known as the GDPR. We hope that the following questions and answers concerning Services and this web site are as concise, transparent, and intelligible as possible. We welcome suggestions for improvement of the content presented below:

QuestionAnswerWhich corporate
entity determines
the purposes and
means of
processing of the
personal data
collected through
Duncan Services?Duncan Aviation, Inc.

(This is the "Controller" under the EU General Data

Protection Regulation.) Who represents this entity with regard to privacy issues? What other entity may process this personal data on behalf of Duncan Aviation, Inc.?	Duncan Aviation, Inc. is responsible for privacy issues related to this activity. Contact information for Duncan Aviation, Inc. can be found in <u>Contact Us</u> . Processors contracted by Duncan to provide services or to host and manage the data on Duncan's behalf.
Whose personal data is intended to be processed by Duncan Services? What are the purposes of processing personal	This site processes the personal data of visitors to the site, who may include Duncan customers and their employees, Duncan suppliers and their employees, and adults in the general public.
	 Duncan Services process personal data to: provide a variety of services to customers and their employees
data collected through Duncan Services?	 communicate with the general public improve the user experience of the site market and advertise our products and services maintain the integrity of our network and address security issues comply with legal and regulatory requirements
What is the legal basis for processing	Processing is necessary for purposes of legitimate interests pursued by Duncan Aviation, Inc.:
the personal data collected through Duncan Services?	 Complying with legal, law enforcement, court, and regulatory requirements Information, system, network and cybersecurity Communicating with stakeholders, including employees, suppliers, and customers
Is the data subject required to provide personal information to	Provision of personal information for this processing activity is not required. Failure to provide information can have a wide variety of impacts, depending on what information is not provided: services may not be available, access may be withdrawn, and system functionality may be impaired.

Duncan Services, and what would be the possible consequences of failing to do so? What specific privacy rights may the individuals whose personal data is processed by Duncan Services have, and how can they be exercised?

European Union data subjects have the right to:

- · request access to and rectification or erasure of personal data or restriction of processing
- object to processing
- data portability
- not be subject to a decision based solely on automated processing that produces legal effects concerning an individual, or similarly affects the individual

They also have the right to lodge a complaint with a supervisory authority.

Data is routinely provided to information technology staff (including information technology security staff), communications, sales, and marketing staff, and service and product managers.

Data is solely processed in the United States of America.

Data will be retained only as long as it continues to be needed for one of the purposes for which it is originally collected. Generally, this is as long as a Duncan has a business relationship with a person, plus a period after that where there is a legal or regulatory reason to retain a record about the relationship. The company maintains a records management system to identify the retention schedule for all records, including records that contain personal data.

Personal data we process includes identifying information such as name, contact information such as address and phone number, business relationship information such as employer, and information on use of this site and related services, such as times of contact and resources accessed.

Who are the recipients of the personal data collected through Duncan Services? In what countries will the personal data be processed? How long will the personal data be retained by Duncan Services?

What categories of personal data are processed by Duncan Services? If you have questions or concerns about privacy issues associated with this site, or if you need assistance to exercise any applicable privacy rights, you may contact Duncan Aviation, Inc. by any of the methods listed in <u>Contact Us</u>.

Corporate changes

In the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock, Duncan is likely to disclose your personal information to the new owners, subject to a requirement that such information be used only in accordance with this Statement, or as otherwise permitted under an applicable agreement.

Contact us

We will provide you with access to your personal information that we hold for any purpose within practical and legal limits. This includes requests that we correct the data if it is inaccurate or delete the data if Duncan is not required to retain it by law or for legitimate business purposes.

If you interact with our Services through an account provided by your organization, that organization typically administers your account, and controls and accesses your data. If your organization is administering your use of our Services, you should direct privacy inquiries to your organizational administrator.

If you have a question about Duncan privacy practices or wish to submit a privacy rights request, please contact Duncan Aviation, Inc. using one of the following methods:

Duncan Aviation, Inc.	
Website	www.duncanaviationparts.com
Email	legal@duncanaviation.com
Postal mail	Duncan Aviation, Inc. Attention: Duncan Legal 3701 Aviation Rd Lincoln, NE 68524 USA

Statement revision

When we modify our Privacy Statement, we will post the updated statement here, with an updated effective date, as indicated below. Effective Date: February 2024