

# Privacy Notice for California Residents

This Privacy Notice for California Residents (the “Notice”) sets forth Duncan Aviation, Inc. (“Duncan”, “we”, “us” and “our”) disclosure obligations under California law. This Notice provides the additional details regarding the information defined as “Personal Information” (including “Sensitive Personal Information”) under applicable California law and related to a California resident or household (“Consumers” and “you”) further referred to as “Personal Information.” This Notice supplements [Duncan’s Privacy & Cookie Statement](#).

## 1. Mandatory Disclosures

Duncan makes the following disclosures for purposes of compliance with California law:

- We do not sell your Personal Information.
- We do not offer substantive financial incentives for the collection or sale of your Personal Information.
- We will not discriminate or retaliate against you if you exercise your privacy rights under California law.
- We do not subject your Personal Information to any fully-automated decision making with a legal or similarly significant impact.
- We do not re-identify de-identified Personal Information.
- We do not use or disclose Sensitive Personal Information for purposes other than those permitted by California law.
- We do not use Sensitive Personal Information to “infer characteristics” about you.

## 2. Collection, Use, and Disclosure of Personal Information

Duncan’s collection, use, and disclosure of your Personal Information are described in detail within the “Collection and use of Personal Information” and “Disclosure of Personal Information” sections of [Duncan’s Privacy & Cookie Statement](#).

## 3. Retention of Personal Information

Duncan’s retention of your Personal Information is described in detail within the “Retention of Personal Information” section of [Duncan’s Privacy & Cookie Statement](#).

## 4. Global Privacy Control Signal Processing

The Global Privacy Control (GPC) empowers users to signal their chosen privacy settings to websites and services through their browser. This signal communicates consumers’ expectations around the sharing and sale of their data online. Duncan websites honor GPC Signals and effectuate site data processing behaviors accordingly. Users can configure the broadcast status of their device’s GPC signal by using the settings menu of participating web browsers and/or browser extensions.

## 5. Categories of Personal Information Collected Within the Last 12 Months

Duncan has, in the preceding 12 months, collected Personal Information from the following categories as specified by California law:

Category of Personal Information Collected	Source(s) of Personal Information	Business Purpose(s) for Processing Personal Information	Third Party Sharing and Disclosure of Personal Information	Retention of Personal Information
<b>Identifiers</b> such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, aircraft tail number, driver's license number, passport number, or other similar identifiers.	We collect this type of information from: <ul style="list-style-type: none"> <li>You</li> <li>Third parties, such as companies that help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records</li> </ul>	We use this type of information to identify you and communicate with you, including: <ul style="list-style-type: none"> <li>To identify you</li> <li>To maintain the integrity of our records</li> <li>To send transactional messages (such as account statements or confirmations)</li> <li>To send marketing communications</li> <li>To provide customer service</li> <li>For security and risk management, fraud prevention and similar purposes</li> <li>For our Everyday Business Purposes</li> </ul>	We may disclose this type of information to our affiliates and to: <ul style="list-style-type: none"> <li>Service providers</li> <li>Third parties under contract to protect the information</li> <li>Other third parties (including government agencies) as required by law</li> </ul>	Personal Information from this Category is retained only as long as is necessary for the purpose of: <ul style="list-style-type: none"> <li>Providing the requested service(s)</li> <li>Everyday Business Purposes</li> <li>Complying with applicable laws</li> </ul>
<b>Additional California Customer Records</b> as listed in the California Customer Records statute, such as name, credit card number, debit card number, or any other financial information.	We collect this type of information from: <ul style="list-style-type: none"> <li>You</li> <li>Payment processors and other financial institutions</li> <li>Third parties that provide security and fraud prevention services</li> </ul>	We use this type of information: <ul style="list-style-type: none"> <li>To fulfill our business relationship with you</li> <li>For recordkeeping and compliance</li> <li>For internal business purposes, such as finance, audits, reporting and analytics</li> <li>For risk management,</li> </ul>	We may disclose this type of information to our affiliates and service providers and to: <ul style="list-style-type: none"> <li>Payment processors, financial institutions and others as needed to complete the transactions and for authentication, security and fraud prevention</li> </ul>	Personal Information from this Category is retained only as long as is necessary for the purpose of: <ul style="list-style-type: none"> <li>Providing the requested service(s)</li> <li>Everyday Business Purposes</li> <li>Complying with</li> </ul>

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| <ul style="list-style-type: none"> <li>fraud prevention and similar purpose</li> <li>• For our Everyday Business Purposes</li> </ul> | <ul style="list-style-type: none"> <li>• Our lawyers, auditors and consultants</li> <li>• Customers, in connection with their audits of Duncan</li> <li>• Other third parties as required by law</li> </ul> | <p>applicable laws</p> |
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**Commercial Information**, such as transaction information, purchase history, financial details and payment information.

We collect this type of information from:

- You
- Payment processors and other financial institutions
- Third parties that provide security and fraud prevention services

We use this type of information:

- To fulfill our business relationship with you
- For recordkeeping and compliance
- For internal business purposes, such as finance, audits, reporting and analytics
- For risk management, fraud prevention and similar purpose
- For our Everyday Business Purposes

We may disclose this type of information to our affiliates and service providers and to:

- Payment processors, financial institutions and others as needed to complete the transactions and for authentication, security and fraud prevention
- Our lawyers, auditors and consultants
- Customers, in connection with their audits of Duncan
- Other third parties as required by law

Personal Information from this Category is retained only as long as is necessary for the purpose of:

- Providing the requested service(s)
- Everyday Business Purposes
- Complying with applicable laws

**Internet or Network Information**, such as information regarding interactions with a website, application, or advertisement

We collect this type of information from:

- You and from your computer or devices when you interact with our platforms, websites and applications
- Automatically, via technologies such as cookies, web beacons
- Third parties, including

We use this type of information:

- For system administration, technology management, including optimizing our websites and applications,
- For information security and cybersecurity purposes
- For recordkeeping
- To better understand our

We may disclose this type of information to our affiliates and service providers and to:

- Third parties who assist with our information technology and security programs
- Third parties who assist with fraud prevention, detection and mitigation
- Contracted third party

Personal Information from this Category is retained only as long as is necessary for the purpose of:

- Providing the requested service(s)
- Everyday Business Purposes
- Complying with

computer security services and advertising partners

customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that they may use

- For online targeting and advertising limited to our own purposes
- For our Everyday Business Purposes

advertising partners under contract to protect the information

- Our lawyers, auditors and consultants

applicable laws

**Geolocation Data**, such as city or county-level, or precise geolocation information

We collect this type of information from:

- You
- Your computer or devices when you interact with our platforms, websites and applications
- Automatically, via technologies such as GPS, Wi-Fi access points, and cell towers

We use this type of information:

- For supporting your use of location-based tools such as airport/map views, city code searches and other features
- For improving Duncan applications

We may disclose this type of information to our affiliates and service providers and to:

- Our lawyers, auditors, consultants
- Third parties under contract to protect the information
- Other third parties as required by law

Personal Information from this Category is retained only as long as is necessary for the purpose of:

- Providing the requested service(s)
- Everyday Business Purposes
- Complying with applicable laws

**Inferences** drawn from other Personal Information such as reading and listening history, search history, and saved items to create a profile.

We collect this type of information from:

- You
- Third parties, including data aggregators and public records providers.
- We may also infer information about you based on information that you have given us and

We use this type of information:

- To better understand you and to understand our customers generally
- To design products, services and programs that delight our customers, including loyalty programs

We may disclose this type of information to our affiliates and service providers and to:

- External partners with whom we have joint marketing arrangements
- Our lawyers, auditors and consultants
- Other third parties as required by law

Personal Information from this Category is retained only as long as is necessary for the purpose of:

- Providing the requested service(s)
- Everyday Business Purposes
- Complying with applicable laws

your past interactions with us and other companies.

- To identify prospective customers
- For internal business purposes, such as quality control, training and analytics
- For our Everyday Business Purposes

applicable laws

**Sensitive Personal Information**, such as social security numbers, or precise geolocation.

We collect this type of information from:

- You
- Third parties, such as aviation regulatory agencies, which verify the information you provided

We use this type of information:

- To book requested travel reservations
- To identify you
- To maintain the integrity of our records
- For customer verification
- For security and risk management, fraud prevention and similar purposes
- For our Everyday Business Purposes

We may disclose this type of information to our affiliates and service providers and to:

- Our lawyers, auditors, consultants
- Other third parties as required by law

Personal Information from this Category is retained only as long as is necessary for the purpose of:

- Providing the requested service(s)
- Everyday Business Purposes
- Complying with applicable laws

## 6. Description of Your California Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the Personal Information that we may have collected about you, subject to certain limitations and requirements, including the verification of your identity and our right to retain information to comply with our legal obligations, among other circumstances.

### California Privacy Right Know and Access your Personal Information

#### Brief Details

You may request, up to two times in a 12-month period, that we disclose to you the categories and specific pieces of Personal Information that we have collected about you, the categories of sources from which your Personal Information has been collected, the business or commercial purpose for collecting your Personal Information, the categories of Personal Information that we disclosed for a business purpose, any categories of Personal Information about you that we sold or

shared, the categories of third-parties with whom we have shared your Personal Information, and the business or commercial purpose for selling your Personal Information, if applicable.

**Request Deletion of your Personal Information**

You have the right to request that we delete certain Personal Information that we may have collected from you.

**Opt-Out of the “Sale” or “Sharing” of your Personal Information**

We do not sell your Personal Information in exchange for money or other valuable consideration, nor have we done so in the last 12 months.

Duncan may “share” Personal Information about you for purposes of serving you with personalized ads or content, otherwise known as “interest-based advertising,” “targeted advertising,” or “cross-context behavioral advertising.”

**Non-Discrimination**

You have the right to opt-out of any future “sharing” of your Personal Information as defined by California law.

You have the right to exercise the rights conferred on you by California law without discrimination.

**Data Portability**

You have the right to request that we transmit certain Personal Information that we may have collected from you to other entities, unless transmitting the information would not be technically feasible.

**Correct Inaccurate Information**

You have the right to request that we correct errors or inaccurate information in the Personal Information that we may have collected from you.

**Opt-Out of Sharing for Cross-Contextual Behavioral Advertising**

You have the right to opt-out of the “sharing” of your Personal Information for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising.”

**Limit the Use or Disclosure of Sensitive Personal Information**

In certain circumstances, you have the right to limit the use of any sensitive categories of Personal Information that we may have collected from you. Duncan however does not use or disclose Sensitive Personal Information for purposes other than those permitted by California law.

**Opt-Out of the Use of Automated Decision Making**

In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information. However, Duncan does not subject your Personal Information to any fully-automated decision making with a legal or similarly significant impact.

## 7. How to Exercise Your California Privacy Rights

You may exercise your California privacy rights or authorize another person to act on your behalf by:

- Emailing the us at: [legal@duncanaviation.com](mailto:legal@duncanaviation.com)
- Writing us at:

Duncan Aviation, Inc.  
Attn: Duncan Legal  
3701 Aviation Rd  
Lincoln, NE 68524

## 8. How To Contact Us

You can find our contact information in the “Contact us” section of [Duncan’s Privacy & Cookie Statement](#).

## 9. Definitions

**Everyday Business Purposes** encompasses the Business Purposes and following related purposes for which Duncan may use your Personal Information:

- To provide the information, product or service requested by the individual or as reasonably expected given the context in which with the Personal Information was collected (such as customer credentialing, providing customer service, personalization and preference management, providing product updates, and dispute resolution)
- For identity and credential management, including identity verification and authentication, system and technology administration
- To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats, and collaborating with cybersecurity centers, consortia and law enforcement about imminent threats
- For fraud detection and prevention
- For legal and regulatory compliance, including all uses and disclosures of Personal Information that are required by law or for reasonably needed for compliance with company policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines
- For corporate audit, analysis and reporting,
- To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, to protect people or property, including physical security programs
- To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics,
- To make back-up copies for business continuity and disaster recovery purposes, and

- For corporate governance, including mergers, acquisitions and divestitures.

## **10. Revisions to This Notice**

From time to time Duncan may need to revise this Notice. Should we do so, we will also change the “Effective Date” indicated below. We encourage you to check back at this website periodically in order to be aware of the most recent version of the Privacy Notice for California Residents.

Effective Date: February 2024