

| Privacy Policy | |
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| Effective Date : | September 22, 2024 |
| Revision Date : | January 5, 2025 |

Chrono Group, which includes Chrono Aviation Inc., Chrono Jet Inc., and WAAS Aerospace Inc., places the protection of personal information of its clients, partners, and employees at the core of its priorities. This policy reflects our commitment to upholding the highest standards in personal data management, in compliance with Law 25 (Québec) and the Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada.

Chrono Group is committed to implementing strong measures to ensure the confidentiality, security, and integrity of personal information while respecting individuals' rights and ensuring transparency in its practices.

1. Purpose

This policy aims to:

- Protect the confidentiality and security of personal information collected, used, and retained by Chrono Group.
- Ensure compliance with applicable provincial and federal laws, including Law 25 and PIPEDA.
- Clearly inform individuals about their rights and Chrono Group's practices regarding the collection, use, and disclosure of personal information.
- Promote an organizational culture focused on privacy, transparency, and accountability.

This policy serves as a reference framework for Chrono Group's clients and partners and guides our actions to prevent privacy breaches.

2. Scope of the Policy

This policy applies to all entities and activities of Chrono Group, which includes:

- Chrono Aviation Inc.
- Chrono Jet Inc.
- WAAS Aerospace Inc.

Chrono Group employs over 200 employees and operates primarily in Québec while interacting with clients and partners across Canada and internationally.

2.1 Affected Individuals

This policy applies to the following groups:

- **Clients:** Travelers, business partners, suppliers.
- **Employees:** Current employees, former, and job applicants.
- **Third Parties:** Subcontractors, service providers, and other authorized partners.

2.2 Covered Activities

This policy covers all activities related to personal information management, including:

- Interactions on digital platforms (website, mobile application).
- Communications conducted in person, by phone, or by email.
- Services provided within our ground operations, flights, or maintenance facilities.

3. Definitions

Personal Information: Any information related to an identifiable individual, either directly or indirectly, such as name, address, phone number, social insurance number, financial information, or biometric data.

Privacy Officer: The Human Resources Director of Chrono Group, responsible for overseeing the implementation of this policy and ensuring legal compliance.

4. Collection of Personal Information

4.1 Why Do We Collect Your Personal Information?

Chrono Group collects personal information to:

- Provide quality services and meet client needs.
- Manage employment relationships and comply with legal and regulatory obligations.
- Ensure the safety of air and ground operations.
- Improve our products and services through analysis and feedback.

4.2 What Information Do We Collect?

For Clients

- **Identification:** Name, surname, date of birth, passport number, vaccination status (if applicable).
- **Contact Information:** Mailing address, email, phone number.
- **Transactional Data:** Payment information, booking history, travel preferences.
- **Digital Data:** IP address, device type, browsing data on our platforms.

4.3 How Do We Collect Information?

We collect your information:

- **Directly** from you via forms, emails, or in-person interactions.
- **Indirectly** through authorized third parties (e.g., travel agencies, employers, business partners).
- **Automatically** using technologies such as cookies, surveillance cameras, or digital tracking systems.

5. Use of Personal Information

5.1 Primary Purposes

Personal information is used to:

- **For Clients:**
 - Manage bookings and provide requested services.
 - Ensure flight safety and security, including identity verification.
 - Respond to service requests and provide flight information.

5.2 Additional Purposes

With your consent, we may also use your information to:

- Conduct analyses to improve our products and services.
- Offer personalized promotions or offers.
- Prevent fraud or detect suspicious activities.

6. Disclosure of Personal Information

6.1 Who Do We Share Your Information With?

Your personal information may be disclosed to:

- **Service Providers:** Baggage handling companies, hotels, car rental companies.
- **Regulatory Authorities:** Customs, immigration, civil aviation regulators.
- **Business Partners:** Travel agencies and third-party carriers for joint itineraries.

6.2 Disclosure Conditions

All data sharing is limited to necessary purposes and is governed by strict contracts requiring third parties to comply with confidentiality obligations and applicable laws.

7. Retention and Security of Personal Information

7.1 Retention Period

We retain your personal information:

- **For clients:** As long as necessary to provide services or meet legal requirements.

7.2 Security Measures

Chrono Group implements robust measures to protect your personal information:

- **Technological:** Data encryption, firewalls, digital access controls.
- **Physical:** Restricted access to sensitive areas and secure storage for paper document.
- **Administrative:** Regular employee training and awareness programs.

7.3 Secure Data Disposal

Personal information that is no longer needed for its intended purposes or legal compliance is securely deleted or anonymized using the following methods:

- Permanent deletion of electronic data using certified software.
- Shredding paper documents containing personal information.
- Deactivation and destruction of physical storage devices (e.g., hard drives, USB keys).

8. Incident Management

In the event of an incident involving your personal information:

- You will be promptly informed if a real risk of harm is identified.
- We will notify the Commission d'accès à l'information (CAI) or the Office of the Privacy Commissioner of Canada, as required by law.

9. Privacy Officer

The Human Resources Director is designated as the Privacy Officer. Their responsibilities include:

- Supervising the implementation of this policy.
- Responding to complaints and individual requests.
- Ensuring legal compliance and managing incidents.

10. Policy Updates

This policy may be updated in response to regulatory or organizational changes. Significant modifications will be communicated prior to take effect.

11. Additional Resources

- Commission d'accès à l'information du Québec (CAI): www.cai.gouv.qc.ca
- Office of the Privacy Commissioner of Canada: www.priv.gc.ca

This policy reflects Chrono Group's commitment to responsible and transparent personal information management.