

Vista America Data Protection Policy

Introduction

In this Policy, “Vista America” or “VA” refers collectively to JetSelect, LLC d/b/a Vista America, an Ohio limited liability company with its office at 4131 Worth Avenue, Columbus, OH 43219 and registration number 1539947 and its affiliates.

Vista America, as a controller of Personal Data, is committed to international compliance with applicable data protection and privacy laws, including without limitation and where applicable, Regulation (EU) 2016/679 (the “**GDPR**”), the California Consumer Privacy Act, and any other states’ privacy laws.

This Policy is based on globally accepted basic principles on data protection and privacy. Ensuring data protection and privacy is the basis of trustworthy business relationships and the reputation of Vista America as a reputable organization.

Policy Applicability: This Policy applies to all employees, officers, directors, and contracted personnel of Vista America, and to such other persons as designated by Vista America from time to time (each an “**Employee**”, collectively “**Employees**”).

Vista America processes certain Personal Data (as defined below) about Data Subjects (as defined below). These data may be processed by computer or may be held in manual filing systems. This Policy comprises the internationally accepted data protection principles without replacing the existing national and/or state laws. It supplements the national and state data protection and privacy laws. Relevant national and state law will take precedence in the event that it conflicts with this Policy, or it has stricter requirements than this Policy. The content of this Policy must also be observed in the absence of corresponding national and/or state legislation. The reporting requirements for data processing under national and state laws must be observed.

This Policy is intended to supplement and not replace other Vista America codes of conduct, policies, rules and procedures that are applicable to Employees from time to time. If an Employee has any doubt as to the codes, policies, rules and procedures applicable in a given situation, or if an Employee perceives any conflict or inconsistency between this Policy and any other Vista America code, policies, rules or procedures or if then he/she should raise the issue with, and seek direction from Vista America’s Data Protection Officer at privacy@vistaamerica.com or from Vista America’s Human Resources. This Policy is a statement of principles and expectations for individual and business conduct. It is not intended to and does not in any way constitute a contract, an employment contract, or assurance of continued employment, and does not create any right in any Employee. The enforcement and interpretation of this Policy rests solely with Vista America.

Contracts of employment executed between Vista America and Employees may contain more specific

provisions addressing some of the matters set out herein. Nothing in this Policy is meant to supersede any more specific provision in any employment contract that is effective between Vista America and any Employee, and to the extent there is any inconsistency between this Policy and any provision of any employment contract, then the provision in the employment contract shall prevail.

The headings contained in this Policy are for convenience only and shall not be interpreted to limit or otherwise affect the provisions of this Policy.

Definitions

“Data Subject” means a natural person to whom the Personal Data relates. Data Subject includes, without limitation, any Employee, any Vista America customer/passenger, any Vista America prospect customer/passenger, and any physical Vista America business partner.

‘Personal Data’ means any information relating to an identified or identifiable natural person. With regard to Employees, Personal Data includes (but is not limited to) information necessary for employment such as the Employee’s name and address and details for payment of salary. With regards to Vista America customers/passengers, Personal Data includes (but is not limited to), names and addresses, bank details, and passport details. With regards to physical Vista America business partners, Personal Data includes (but is not limited to), names and addresses, and bank details for payment of invoices.

‘Vista America Data Protection Officer’ is the person responsible for monitoring compliance with the CCPA, GDPR and any and all other applicable privacy laws/regulations.

Principles and Responsibilities

Vista America is committed to each of the following principles and therefore each Employee shall ensure that he/she does not commit any act or omission that may result in Vista America being in breach of any of such principles:

- a. **Personal Data must be processed fairly and lawfully, and must only be processed with legal justification:** Vista America must be able to justify any processing activity which it carries out.
- b. **Personal Data may only be processed with good practice, and for specific and lawful purposes:**

Personal Data can only be processed for the purpose that was defined before the data was collected.

The ‘lawful purposes’ for processing Personal Data are:

- (i) **Consent:** the Data Subject has given clear consent for Vista America to process his/her Personal Data for a specific purpose.
- (ii) **Contract:** the processing is necessary for a contract that Vista America has with the Data Subject, or because the Data Subject has asked Vista America to take specific steps before

entering into a contract.

- (iii) Legal obligation: the processing is necessary for Vista America to comply with the law (not including contractual obligations).
- (iv) Vital interests: the processing is necessary to protect someone's life.
- (v) Public task: the processing is necessary for Vista America to perform a task in the public interest or for Vista America official functions, and the task or function has a clear basis in law.
- (vi) Legitimate interests: the processing is necessary for Vista America's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the Data Subject's Personal Data which overrides those legitimate interests.

- c. **Personal Data is only collected for specific, explicitly stated and legitimate purposes:** The Data Subject must be informed on how his/her data is being handled.
- d. **Personal Data must be adequate, relevant and not excessive:** Employees are advised to resist any temptation to collect any Personal Data which they are not already authorized to collect even if he/she thinks this may assist Vista America. Employees should check with their direct supervisor or the Vista America Data Protection Officer before he/she starts collecting any additional Personal Data.
- e. **Personal Data must be accurate and up to date:** Personal Data on file must be correct, complete, and – if necessary – kept up to date. Steps must be taken to ensure that inaccurate or incomplete data are deleted, corrected, supplemented or updated. Employees should attempt to avoid using guess work to decipher any documents which he/she cannot read clearly as this could result in Vista America holding inaccurate information.

Vista America will endeavor to ensure that all Personal Data held in relation to its Employees is accurate. Employees must notify the Vista America Human Resources Department of any changes to information held about them.
- f. **Personal Data must not be kept for longer than is necessary:** Personal Data should be retained in accordance with Vista America's data retention related policies that may be issued and updated from time to time.
- g. **Personal Data must be kept secure and protected against unauthorized or unlawful processing and against accidental loss, destruction or damage:** Personal Data must be treated as confidential at all times. Any Personal Data processing undertaken by an Employee that he/she has not been authorized to carry out as part of his/her legitimate duties is strictly prohibited.

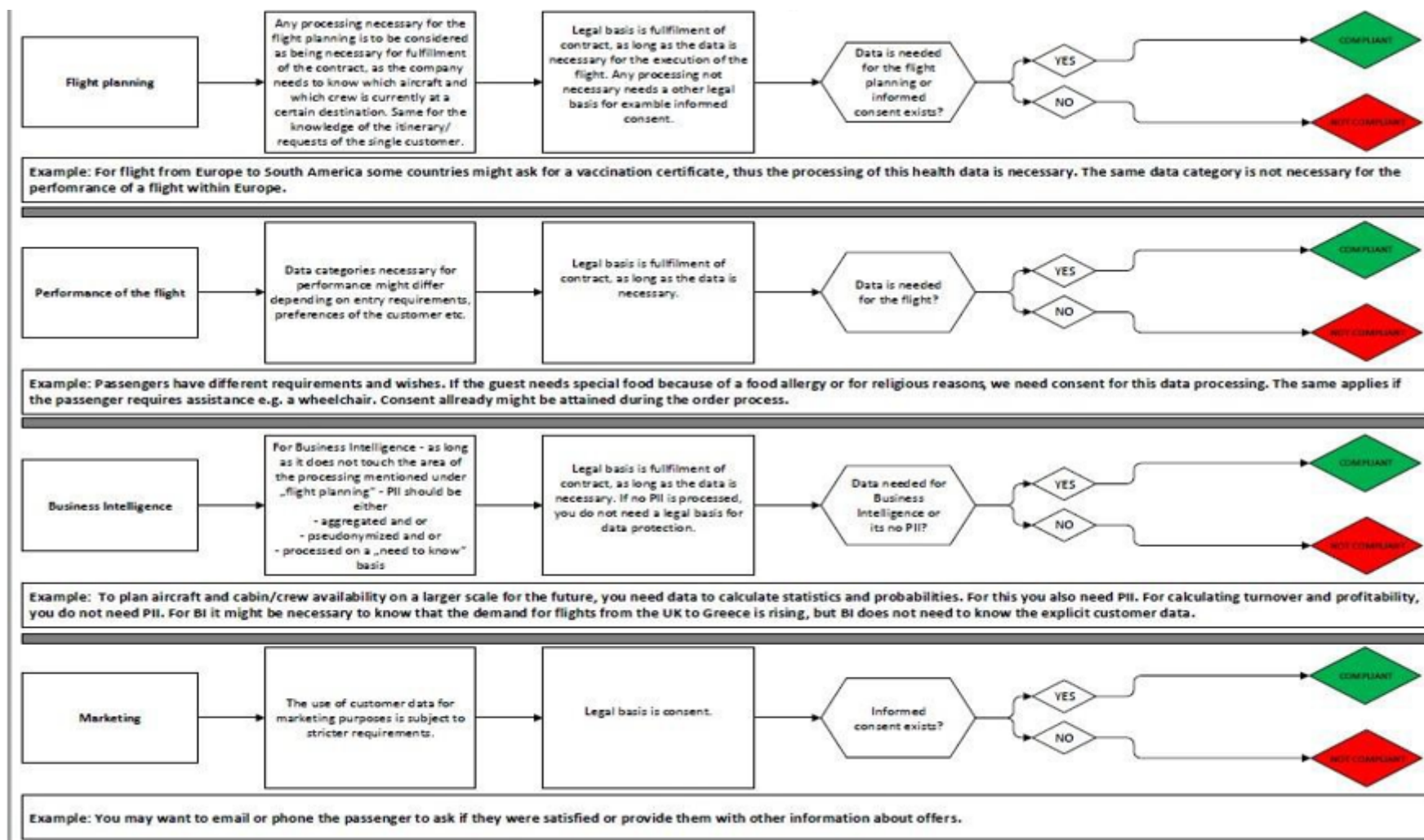
Employees may have access to Personal Data only as is appropriate for the type and scope of the task in question. Employees are forbidden to use Personal Data for private purposes, to disclose it to unauthorized persons, or to make it available in any other way. Supervisors and managers must inform their Employees at the start of the employment relationship about the obligation to protect Personal Data secrecy. This obligation shall remain in force even after employment has ended.

For clarity, and without limitation to the generality of the foregoing: (i) Personal Data relating to Vista America customers/passengers is strictly confidential and should not be disclosed to any person (including without limitation, disclosure through social media (such as Facebook, Instagram, LinkedIn, snapchat etc.)); and, (ii) from time to time there are news stories which may generate calls from journalists or other interested parties looking to confirm or gather information regarding Vista America passengers that have flown on aircraft operated by Vista America. In any such event, Employees receiving such calls or emails requesting information should decline to provide any information and should refer the person making the request to Vista America's Legal Department.

- h. **Personal Data shall be transferred to a country outside the United States only in accordance with those instructions and policies that may be issued and updated by Vista America from time to time.**
- i. **Personal Data that is manual (e.g. paper), should be stored in a secured area under lock and key when not in use.**
- j. **Personal Data that are taken outside Vista America offices by Employees who for example take work at home and/or work remotely and/or work whilst travelling must be kept secure on the journey, in the car and at home. Employees are responsible for the data once they are taken out from Vista America offices.**
- k. **Sensitive Personal Information shall be processed in accordance with applicable law.** Sensitive Personal Information is, pursuant to the CCPA, a specific subset of personal information that includes certain government identifiers (such as social security numbers); an account log-in, financial account, debit card, or credit card number with any required security code, password, or credentials allowing access to an account; precise geolocation; contents of mail, email, and text messages; genetic data; biometric information processed to identify a consumer; information concerning a consumer's health, sex life, or sexual orientation; or information about racial or ethnic origin, religious or philosophical beliefs, or union membership. Consumers have the right to also limit a business's use and disclosure of their sensitive personal information.

Examples of personal data, including sensitive data as defined above, processed by Vista America in the provision of its core activities are: customer's name and surname, address contact details, date of birth, social security number or equivalent, passport details, dietary preferences or restrictions, allergies.

The table below provides further guidance on the processing of personal data performed by Vista America in the provision of its core activities.



Rights of Data Subjects

A Data Subject may enjoy a number of rights in relation to his/her Personal Data, such as the right:

- i. to request information on which Personal Data relating to him/her has been stored, how the data was collected, and for what purpose.
- ii. if Personal Data is transmitted to third parties, to information about the identity of the recipient or the categories of recipients (for example, where it relates to Vista America passengers, the Vista America Privacy Policy clearly stipulates those third parties to whom certain data may be transmitted by Vista America).
- iii. if Personal Data is incorrect or incomplete, to demand that it be corrected or supplemented.
- iv. to object to the processing of his or her Personal Data for purposes of advertising or market/opinion research.
- v. to request his/her Personal Data to be erased if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons.
- vi. to object to his/her Personal Data being processed. This does not apply if a legal provision requires the data to be processed.
- vii. to lodge a complaint with a public supervisory authority.
- viii. to access and rectify.
- ix. to data portability.
- x. **To object to decisions made solely using automated processing including profiling, and to request human intervention, under certain circumstances.**

Note: In the event that an Employee receives from any other Employee or from any other person (such as a customer or supplier) a request under any of the above paragraphs (i) to (ix), then the Employee shall immediately notify the Vista America Data Protection Officer or the Privacy Team with any such request prior to taking any action and shall only act pursuant to the instructions received from the Vista America Data Protection Officer or from the Privacy Team.

Employee Personal Data

Personal Data of each Employee shall be processed by Vista America, as the controller, in line with, the contract of employment between that Employee and Vista America, this Policy, Vista America's other relevant policies that may be issued and updated from time to time, and applicable law.

Vista America holds and processes, both electronically and in hard copy form, Personal Data, relating to Employees, for the following purposes:

- (i) for the performance of activities relating to their contract of employment;

Provided that, this may require Vista America to transfer such Personal Data for storage and/or processing for administrative purposes to, other offices it may have, or to any another company forming part of Vista America, within or outside the United States; and, Provided further, that, in such cases an adequate level of protection shall be ensured.

- (ii) for compliance with legal obligations to which Vista America is subject;

- (iii) processing is necessary for the purposes of the legitimate interests pursued by Vista America or by a third party namely the smooth, efficient successful operations of Vista America's business to the satisfaction of its third-party stakeholders, including clients;

Provided that, in such cases, Vista America's legitimate interest shall not override the Employee's interests or fundamental rights and freedoms which require protection of Personal Data; and,

Provided further, that, Vista America's legitimate interest shall include Vista America's right and interest to, amongst other things:

- a. detect and / or prevent the loss of intellectual and material company property;
- b. improve employee's productivity, protect confidential information of Vista America and its third- party stakeholders; and,
- c. ensure the safety and security of its employees, and its third-party stakeholders;
through monitoring and recording activities as defined in Vista America's policies that may be
issued and updated from time to time.

Sensitive Personal Data shall also be processed by Vista America in the circumstances where processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment, for the purposes of preventive or occupational medicine, for the

assessment of an Employee's working capacity, medical diagnosis and the provision of health or social care or treatment in terms of law or pursuant to contract with a health professional.

Vista America may provide Personal Data to external service providers who administer an Employee's benefits solely for the purpose of providing that Employee with those benefits.

Personal Data of Employees shall be stored in accordance with those retention periods set by applicable law and by Vista America's internal policies that may be issued and updated from time to time.

Vista America Privacy Policy

Each Employee shall comply with this Privacy Policy and shall ensure that he/she does not commit any act or omission that may result in Vista America being in breach of the said Privacy Policy. The latest version of this Privacy Policy is incorporated into this Policy by reference.

Business Contacts

Vista America may, for purposes of conducting its business operations and for purposes of performing any contract of employment or contract for pilot services, disclose to any person, details relating to an Employee's employment such as the Employee's position title, company email address(s), and company phone number(s) (including company mobile phone number(s)).

Video Surveillance

For the safety and security of its Employees, offices, assets, and visitors, Vista America operates a video surveillance system at certain of its offices and premises. CCTV systems are employed by Vista America only for the purposes of security and monitoring / law enforcement purposes. Where, in carrying out these purposes, the CCTV images reveal actions which breach any applicable law and/or any of Vista America's policies and procedures, these images may be used as evidence.

- i. Cameras are not hidden from view and are sited in such a way to ensure that they only monitor the spaces intended to be covered; and,
- ii. None of Cameras are motorized, and therefore zoom functions or viewing angles have to be

manually adjusted by opening the dome cameras.

In case of an activity captured by the camera, which may involve an Employee or a visitor and which may require an internal investigation, Vista America reserves the right to extract the relevant footage and take all such actions deemed necessary in the particular circumstances. The video surveillance system will not capture audio and will therefore not be used to record conversations between Employees.

The Vista America Data Protection Officer, the President, the General Counsel, the Chief HR Officer, the Senior Director Human Resources, the employees of the Legal Department, the authorized Vista America IT Infrastructure personnel, and any other person authorized by the Vista America Data Protection Officer and/or by the Chief HR Officer from time to time, may view the live footage captured by the video surveillance systems and review the camera recordings.

Recorded material is stored in a place which is deemed secure and which has an adequate level of security. In addition, it is also stored in a way that ensures that it maintains the integrity of the image recorded. This is to ensure that the rights of the Data Subjects captured by the CCTV system are protected. Recorded material shall be retained in accordance with those retention periods set by applicable law and by Vista America's internal policies that may be issued and updated from time to time. Recorded material may be retained for longer if it is likely to be used as evidence in a court of law.

Images of an activity which may lead to criminal charges may be disclosed to the police or to any other competent law enforcement authority for the purpose of any investigation or prosecution of a criminal offence. In those circumstances where an incident needs to be investigated, it would not be appropriate to disclose images of identifiable individuals to others. Any other requests for images will be approached with care and will not be easily entertained.

In the case of an investigation, internal or otherwise, the images will be retained until the investigation is terminated. In such cases, only the relevant extract will be retained. Where a law enforcement authority is investigating a crime, the relevant images will be provided to such authority as required by law.

Employees whose images are recorded have a right to view the images of themselves. If images of third parties are also shown together with the images of the person who has made the access request, images involving such third parties will be obscured.

Training

Employees are expected to complete mandatory Data Privacy Training in a timely manner. Failing to attend or complete such mandatory training could potentially expose Vista America to severe legal and reputational risk(s). Such training will be refreshed regularly, ideally once a year or whenever there is a substantial change in legislation that employees need to be aware of.

Other Vista America Codes, Policies, and Procedures

Employees shall at all times comply with all Vista America codes, policies, rules and procedures that apply to them from time to time, and that relate to data protection and data privacy related matters within Vista America. The latest versions of such codes, policies, rules and procedures are available on Vista America's internal online systems accessible by all Employees.

Enquiries

If an Employee has any questions regarding his/her responsibilities under this Policy, then he/she should seek advice from his/her direct supervisor or from the Vista America Data Protection Officer by sending an email to privacy@vistaamerica.com.

Breach of Policy Reporting Procedure

Vista America is fully committed to developing a **Speak up** culture - Employees should not be afraid to speak up if they think that something is wrong or needs to be fixed. Employees should at all times feel comfortable sharing their views, asking questions, flagging anomalies, expressing concerns, or reporting perceived violations of this Policy. If an Employee becomes aware of any suspected or known violations of this Policy, then he/she has a duty to promptly report such concerns in accordance with ***Vista America's Speak Up Procedure for Reporting Concerns Relating to Improper Practices***.

Consequences for Non-Compliance

If an Employee fails to comply with this Policy, then he/she may be subject to disciplinary action that may include dismissal from employment. Disciplinary measures will depend on the circumstances of the violation and will be applied in a manner consistent with Vista America's policies.

Revisions

Vista America will review this Policy on a regular basis at its absolute discretion and will introduce revisions where necessary or appropriate. Vista America may also issue addenda, guidelines and memoranda from time to time to supplement this *Policy*. The latest version of this Policy and of any addenda, guidelines and memoranda will always be available online on Vista America's internal online systems that are effective from time to time and are accessible by all Employees. It is the responsibility of Employees to access these online systems and view the latest version of this Policy and of any addenda, guidelines and memoranda, from time to time.

Confirmation

Each Employee shall periodically, whenever requested by Vista America (as a minimum once a year), individually confirm in writing, or by any electronic means introduced by Vista America from time to time, to Vista America that he/she has read this Policy and agrees to comply therewith.

Document Owner

President

Version Control

Date	Version	Description
11/01/2023	01	Effective Date
10/10/2025	02	Revisions to Version 1