

Privacy Policy

Fly You Out, which is operated by 15561469 Canada Inc. (“**Fly You Out**”, “**we**” or “**us**”), respects the privacy of your personal information (“**Personal Information**”) and is committed to protecting it and using it solely for the purposes for which it was collected. Please also read and review our Terms of Service.

The purpose of this privacy policy (“**Privacy Policy**”) is to inform you of our privacy practices and to provide you with information on why and how Fly You Out collects your Personal Information and how it is kept and used.

This Privacy Policy applies to all personal information collected by Fly You Out from the website www.flyyouout.com (the “**Site**”) and its associated applications (the “**Platform**”) and also through communications you may have directly with Fly You Out by email, phone or otherwise. The Platform (and the work we do to maintain, update and support it) provides an interactive way for members to communicate, explore companionship, and entertain themselves with luxury travel and events (the “**Services**”).

If you are an individual who has provided us with your express consent to collect and use your Personal Information in certain ways, you may withdraw your consent at any time by contacting our Privacy Officer using the contact information provided in the "Contact Us" section of this Privacy Policy.

Last Updated: April 18, 2024

1. Personal Information We Collect

We may collect various types of Personal Information from you, including but not limited to the following:

Information you provide to us. Personal Information you may provide to us through the Platform or otherwise includes:

- **Contact data**, such as your first and last name, email address, passport, location and phone number.
- **Demographic or characteristics information**, such as your gender identity, age, date of birth, sexual preference, sexual orientation, race, origin, and religion (if you choose to provide them).
- **Communications data** based on our exchanges with you, including when you contact us through the Platform, social media, email or otherwise.
- **Financial Information** used for making payments or purchases via the Platform, such as your bank account details, credit card information and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Account data**, such as the username and password that you may set to establish an online account on the Platform, or login information for social media accounts you use to connect to our Platform, if applicable.

- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine Personal Information we receive from you with Personal Information we obtain from other sources, such as:

- **Public sources**, such as public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information that we use to provide the Platform.

Automatic data collection. We, our service providers, and our business partners may automatically log certain data about you, your computer or mobile device, and your interaction over time with the Platform, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 5G), and general location information such as city, state or general geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing the Platform, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our emails, or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices to allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place and “third party” cookies that our service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

We may use cookies to allow the technical operation of the Platform, enhance the functionality of the Platform, and help us understand user activity on the Platform (including which pages are most and least visited and how visitors move around the Platform, as well as user interactions with our emails).

We do not knowingly solicit, collect, or share information from any individuals under the age of 18.

2. How We Use Your Personal Information

In general, we will only use Personal Information for the primary purpose(s) and applicable legitimate purpose(s) for which it was collected (all of which will usually be identified to you at the time we collect it), or for purposes consistent with these primary purposes. Beyond that, we may use your Personal Information for the following legitimate business purposes (or in other ways that we ask you for at the time we collect it):

Platform delivery and operations. We may use your Personal Information to:

- provide, operate and improve the Platform and our business;
- depersonalize or anonymize them;
- communicate with you about the Platform, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Platform and our communications; and
- provide support and customer service for the Platform, and respond to your requests, questions and feedback.

Marketing. We and our service providers may collect and use your Personal Information to send you direct marketing communications.

Compliance and protection. We may use your Personal Information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Platform; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Identity verification. For safety and security purposes, and to ensure you can enjoy a safe experience on our Platform, we may request identity verification before you can access our Platform. Our verification process may involve asking for your phone number and, in certain cases, submitting a selfie and/or passport for photo verification. We implement these measures to safeguard our Platform and users against fraudulent activities, criminal behaviour, sexual assault or harassment, and other potential risks. Utilizing third-party technology, including facial recognition, allows us to compare submitted photos with identity documents. We will retain this information for record-keeping until it is no longer necessary for operational purposes or for a maximum of three years following your last interaction with our Platform, whichever comes first.

Upon expiration of the retention period, we will undertake commercially reasonable steps to permanently and securely erase this data from our systems.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your Personal Information, such as when required by law, or for when we have a new legitimate purpose for using your Personal Information that we did contemplate at the time it was originally collected from you.

3. How We Share Your Personal Information

In general, we only share or communicate de-identified or anonymized, aggregated information that does not directly or indirectly identify any individual to our customers and partners, on behalf of our users. However, there are some exceptions to this, as explained below.

Sharing with third-party service providers. We may share your Personal Information with third-party service providers and/or partners who provide us with website, application development, hosting, analytics, or other services who need to access or process your Personal Information in connection with the services they provide to us. In such cases, they are contractually bound to keep your data confidential and to comply with privacy laws.

Sharing with employees. Our employees are bound by a duty of confidentiality. They only have access to your Personal Information in an anonymized or de-identified form, on a “need-to-know” basis or if reasonably required by their duties.

Sharing with legal authorities. We may also need to disclose Personal Information to comply with a legal obligation or to enforce our rights, including to government authorities and law enforcement agencies where required by applicable law.

4. Your Rights

Under certain circumstances and in accordance with applicable privacy laws, you have a number of rights when it comes to the Personal Information you provide to Fly You Out:

- **Access:** right to ask whether we hold Personal Information about you and the right to access that information.
- **Rectification:** right to request the rectification of any incomplete or inaccurate Personal Information we hold about you.
- **Withdrawal of consent:** right to withdraw your consent to the disclosure or use of Personal Information collected.
- **Destruction request:** right to request the destruction of the Personal Information we hold about you.
- **Request for information:** right to request certain information relating to decisions based exclusively on the automated processing of Personal Information.

5. How We Protect Your Personal Information

We follow generally accepted industry best-practices and standards to protect the information transferred to us. We maintain appropriate physical, technical, logical, and administrative safeguards, proportional to the

sensitivity of the Personal Information, to protect it from unauthorized disclosure or access, accidental or unlawful alteration, loss or destruction, misuse, or other unlawful form of processing of the Personal Information in our possession.

Although we ensure that adequate safeguards are in place to protect Personal Information, data transmission over the Internet still comes with inherent risks. We cannot guarantee that third party actors will not maliciously attempt to hack our systems, and we are not responsible for third party interceptions of data in transit if they have managed to circumvent our security protocols in circumstances where there were no vulnerabilities or deficiencies in our systems. In those situations, we cannot be held liable for any misappropriation, interception, modification, deletion, destruction, or use of data provided through our Platform.

We strongly advise and urge you (and all users of Fly You Out) to exercise caution when sharing personal information with others using the Platform. It is not advisable to include email addresses, URLs, instant messaging details, phone numbers, full names or addresses, credit card details, government-issued identity numbers, driver's license details, and other sensitive information that could be vulnerable to abuse or misuse on your profile.

When you share information about yourself or engage in messaging with other users, the level of personal data you disclose is your responsibility and entails inherent risks.

If you have reason to believe that any Personal Information has been compromised, please contact us as set forth in the "Contact Us" section.

In the case of a data security breach involving your Personal Information, we will notify you without undue delay after we become aware of such breach, and will work diligently to investigate, contain, and remediate the breach, all as required by applicable law.

6. How We Store and Retain Your Personal Information

We are headquartered in Canada and may use service providers that operate in other countries. Your Personal Information may be stored or transferred to other locations where privacy laws may not be as protective as those in your state, province, or country.

If you are considered a "data subject" under the EU General Data Protection Regulation (GDPR), then we will handle your Personal Information in accordance with the GDPR.

We are committed to complying with the California Consumer Privacy Act ("CCPA") and protecting the privacy rights of California residents. Specifically, Fly You Out does not sell Personal Data to third parties and is committed to protecting the privacy rights of all Data Subjects, including those residing in California. Data Subjects may exercise their rights under the CCPA by contacting Fly You Out directly as indicated at the end of this Privacy Policy. We will respond to any request within the timeframes required by the CCPA.

We will retain Personal Information only for as long as necessary for the purposes set out in this Privacy Policy and to comply with our legal and regulatory obligations. To find out more about how long we keep Personal Information, please contact us as set forth in the "Contact Us" section.

7. Third Party Websites

The Platform may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not

associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services that you use.

8. Updates To This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to it, we will notify you by updating the date of this Privacy Policy and posting it on the Platform or other appropriate means. Any changes to this Privacy Policy will be effective upon our posting of the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Platform after the effective date of any modifications indicates your acceptance of the modifications. If you have any issues with any modifications, please contact us to discuss them.

9. Contact Us

To exercise your rights, file a complaint, obtain information about our policies and practices or if you have questions or comments about this Privacy Policy, please contact our Privacy Officer by email at aaron@flyyouout.com or by mail at the following address:

15561469 Canada Inc.
Attention: Privacy Officer
18, Rean Drive Unit 203 North York ON M2K 0C7

If you prefer not to receive information from us, either through email, postal mail or by phone, please follow the unsubscribe instructions within the email message or contact us at aaron@flyyouout.com. Please note that such requests may take up to 2 weeks to become effective. In addition, if you ask us to remove your name and address from our email lists, we will maintain your name in a “do not mail” file to ensure that we can honour your request.