



PRIVACY POLICY:

Nubis Aviation Training is the trading name of Nubis Aviation Ltd registered under Companies House Scotland; registration number SC567896.

Access to, and use of any website, service or social media sites (herein; website, service or social media sites collectively referred to as 'Sites associated with Nubis Aviation Training') are provided by Nubis Aviation Ltd in accordance with their Terms & Condition.

1. ABOUT THE POLICY

- 1.1 The terms "we", "us" and "our" refer to Nubis Aviation Ltd. The term "you" refers to you, as a user of Sites associated with Nubis Aviation Training.
- 1.2 This Privacy Policy sets out how Nubis Aviation Ltd obtains, manages, uses and protects your data and relates specifically to information held by Nubis Aviation Ltd.
- 1.3 All data is held securely and in accordance with the General Data Protection Regulation (GDPR) (EU) [2016/679](#). This database is protected by multi-level authentication and access is restricted to individuals who need to see the data to carry out their duties at Nubis Aviation Training. User access rights to the database are restricted according to individual job roles and access is reviewed on a regular basis.
- 1.4 You will be deemed upon registration for your online account to be a Nubis Aviation Training account holder (Account Holder) and be bound by the company's Terms & Conditions, which shall take effect immediately on your first use of this website.
- 1.5 Nubis Aviation Ltd may change Privacy Policy from time to time and so you should check this Policy regularly. Revised Privacy Policies will apply from the date of the publication of the revised Privacy Policy on this website. Your continued use as an Account Holder will be deemed as acceptance of the updated or amended Privacy Policy. If you do not agree to the changes, you should cease using Sites associated with Nubis Aviation Training.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

- 2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).
- 2.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - Identity Data includes your first name and your last name;
 - Contact Data includes billing address, delivery address, email address and telephone number;
 - Profile Data includes your username and password, orders made by you, preferences and feedback;
 - Transaction Data includes details about payments to and from you and the products you have purchased from us;



- Technical Data includes IP Address, Login data, browser type and version, location, operating system and platform and device type;
- Usage Data includes how you use and how you came to visit our website;
- Marketing and Communications Data includes your choices in receiving marketing from us and our third parties and your communication preferences.
- Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.3 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

3. HOW WE COLLECT YOUR PERSONAL DATA

3.1 We use different methods to collect data from and about you, including through:

- Directly. You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: Apply for our products or services; Create an account on our website; Subscribe to our service or publications; Request marketing to be sent to you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties [and public sources] as set out below:
 - Technical Data from the following parties:
 - Analytics providers such as Google based outside the EU;
 - Search information providers based inside OR outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Performance of Contract – this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Legitimate Interest – this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our



legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us via info@nubisaviationtraining.com

- Comply with a legal or regulatory obligation – this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

4.2 Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us via email at services@nubisaviationtraining.com

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

5.1 We have set out below a description of all the ways we plan to use your personal data:

- to register and administer your account if you choose to register with us;
- to process your order, including taking payments, supply products and any after-sales services such as cancellations or returns and processing refunds;
- to keep you updated on the progress of your order;
- to update you of any changes in terms or policies;
- to ask you to leave a review for a product or service you have received;
- to make suggestions and recommendations that may be of interest to you;
- to analyse sales to help us improve our website and process royalty payments;
- to use data analytics to improve our website, products and services, marketing and customer experiences;
- to administer and protect our business and this website including troubleshooting, maintenance, support and security issues.

5.1 Marketing - We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.2 Promotional offers from us - We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

5.3 You may receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted in to receive that marketing.

5.4 Third-party marketing - We will get your express opt-in consent before we share your personal data with any company outside the Nubis Aviation Training Limited group of companies for marketing purposes.

5.5 You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us via services@nubisaviationtraining.com at any time.



- 5.6 Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase or registering to use our website.
- 5.7 We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact one of our data representatives via info@nubisaviationtraining.com

6. OUR USE OF COOKIES

- 6.1 Cookies are small text files passed by us to your computer's hard drive via your browser. These may be used by Nubis Aviation Ltd to make sure our websites work effectively and to improve your user experiences on them. Information supplied by cookies can help us work out how you use our sites; for example, which pages you look at, and whether you experience any errors. We also use cookies to remember your preferences and understand how you interact with our sites.
- 6.2 You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.
- 6.3 Cookies on our website include:
- `_Session ID` - this cookie is used to keep a user signed into their account.
 - `_ga` - used by Google Analytics to identify a user.
 - `_gac_propertyID` - Contains site related information for the user.
 - `_utmz` - stores the method a user used to access the website, their source.
 - `_utmv` - used to store visitor-level custom variable data.
 - `_utmt` - used to throttle request rate.

7. WHO WE SHARE YOUR PERSONAL DATA WITH

- 7.1 We may have to share your personal data within the Nubis Aviation Ltd group and with parties for the purposes set out in section 5. These include:
- Payment acquiring services to process your payment and refunds, this may include credit reference and fraud prevention agencies for credit checking and identity verification;
 - Course content providers;
 - Analytics and search engine providers to assist us with the improvement and optimisation of our website;
 - Website developers and hosting providers to help us maintain the software which allows us to run our website;
 - Professional advisers including lawyers, banking, legal, insurance and accounting services;
 - HM Revenue & Customs, regulators and other authorities in the UK who request reports of processing activities under certain circumstances.
 - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.



- 7.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 7.3 If you fail to provide personal data Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

8. JURISDICTION AND ACCEPTANCE OF THIS POLICY

- 8.1 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
- 8.2 We believe that the relationship we have with our Account Users is a life-long relationship and so we retain your data until such time as you request its removal. We will always maintain a record on our database containing at least your biographical and education details for statistical purposes and to ensure we do not inadvertently contact you in the future.
- 8.3 You may update your communication preferences and opt-out of receiving some or all communications from us at any time.
- 8.4 You may wish to request details of personal information which we hold as per the General Data Protection Regulation (GDPR) (EU) [2016/679](#). If you wish to raise a complaint on how we have handled your personal data, please contact us at services@nubisaviationtraining.com
- 8.5 We regularly review this Policy and update it if there are any changes in how we manage your data and legislative requirements. This page will always contain the latest version of this Policy.
- 8.6 This Privacy Policy, and any dispute in relation to the materials available from Sites associated with Nubis Aviation Training, are governed by Scottish law. The Scottish courts have exclusive jurisdiction to settle any disputes which may arise out of or in connection with this Policy.
- 8.7 If any provision of this Policy is or is found to be, unenforceable under applicable law, that will not affect the enforceability of the other provisions of this Policy.
- 8.8 This Policy was last updated in March 2020.