

**Safe Harbor Privacy Statement
Seagil Software Company**

Effective Date: 1-December-2013

Seagil Software Company (Seagil) believes in protecting your privacy.

- A. Seagil does not collect personal information from you on our website.
- B. Seagil provides a computer software application for charter and corporate flight departments. That computer application includes computer programs and data. The data includes information about flight crew personnel and passengers. That information may include personal information such as passport numbers, pilot licenses, dates of birth and other information that may be classified as personal.
- C. Seagil's clients (Users) are responsible for the collection and maintenance of the crew and passenger information.
- D. Seagil accesses the User's information only in the capacity of providing technical support for the application.
- E. Seagil complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from European Union member countries and Switzerland. Seagil has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Seagil's certification, please visit <http://www.export.gov/safeharbor/>.
- F. These are our promises to you:
 - a. Notice. If and when we collect your personal information, we'll give you timely and appropriate notice describing what personal information we're collecting, how we'll use it, and the types of third parties with whom we may share it.
 - b. Choice. We'll give you choices about the ways we use and share your personal information, and we'll respect the choices you make.
 - c. Relevance. We'll collect only as much personal information as we need for specific, identified purposes, and we won't use it for other purposes without obtaining your consent.
 - d. Retention. We'll keep your personal information only as long as we need it for the purposes for which we collected it, or as permitted by law.
 - e. Accuracy. We'll take appropriate steps to make sure the personal information in our records is accurate.
 - f. Access. We'll provide ways for you to access your personal information, as required by law, so you can correct inaccuracies.

- g. Security. We'll take appropriate physical, technical, and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.
- h. Sharing. Except as described in this policy, we won't share your personal information with third parties without your consent.
- i. International Transfer. If we transfer your personal information to another country, we'll take appropriate measures to protect your privacy and the personal information we transfer.
- j. Enforcement. We'll regularly review how we're meeting these privacy promises, and we'll provide an independent way to resolve complaints about our privacy practices.

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at:

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