

WORLDWIDE FLIGHT SERVICES PRIVACY SHIELD POLICY

The content of this document is the property of the WFS group

Worldwide Flight Services, Inc. (“WFS”) (together with its subsidiaries “we,” “our,” and “us”), complies with the EU-U.S. Privacy Shield as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data (as defined below) from European Union member countries. WFS has certified that it adheres to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement, and Liability.

Definitions

“**Data Subject**” means the individual to whom any given Personal Data covered by this Privacy Shield Policy refers.

“**Personal Data**” means any information relating to an individual residing in the European Union that can be used to identify that individual either on its own or in combination with other readily available data, including, but not limited to, human resource data.

“**Sensitive Personal Data**” means Personal Data regarding an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, or sexual life.

Scope and Responsibility

This Privacy Shield Policy applies to Personal Data transferred from European Union member countries’ operations in the U.S. in reliance on the respective Privacy Shield framework. Adherence by WFS to this Privacy Shield Policy may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations, but Personal Data covered by this Privacy Shield Policy shall not be collected, used, or disclosed in a manner contrary to this policy. This policy covers WFS and the following entities: Newport Cargo, LLC, Cool Time Arrivals, LLC, PHS Logistics, LLC, WFS Express, Inc., Cargo Airport Services Canada, Inc. Worldwide Flight Services, Inc. Virgin Islands Branch, Worldwide Flight Services Holdings, Inc. and Oxford Electronics, Inc.

WFS complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Nation to the United States. WFS has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit: <https://www.privacyshield.gov/>.

Privacy Shield Principles

WFS commits to subject to the Privacy Shields' Principles all Personal Data received by WFS in the U.S. from European Union member countries in reliance on the respective Privacy Shield framework.

1. Notice

WFS notifies Data Subjects covered by this Privacy Shield Policy about its data practices regarding Personal Data received by WFS in the U.S. from European Union member countries in reliance on the respective Privacy Shield framework.

2. Choice

If Sensitive Personal Data covered by this Privacy Shield Policy is to be used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a third party, WFS will obtain the Data Subject's explicit consent prior to such use or disclosure.

3. Accountability for Onward Transfer

In the event we transfer Personal Data covered by this Privacy Shield Policy to a third party acting as a controller, we will do so consistent with any notice provided to Data Subjects and any consent they have given, and only if the third party has given us contractual assurances that it will (i) process the Personal Data for limited and specified purposes consistent with any consent provided by the Data Subjects, (ii) provide at least the same level of protection as is required by the Privacy Shield Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the Personal Data or take other reasonable and appropriate steps to remediate if it makes such a determination. If WFS has knowledge that a third party acting as a controller is processing Personal Data covered by this Privacy Shield Policy in a way that is contrary to the Privacy Shield Principles, WFS will take reasonable steps to prevent or stop such processing.

With respect to our agents, we will transfer only the Personal Data covered by receiving notice from an agent. However, we will not transfer any Personal Data if such Agent can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, and we will take reasonable and appropriate steps to stop and remediate unauthorized processing. WFS remains liable under the Privacy Shield Principles if an agent processes Personal Data covered by this Privacy Shield Policy in a manner inconsistent with the Principles, except where WFS is not responsible for the event giving rise to the damage.

4. Security

WFS takes reasonable and appropriate measures to protect Personal Data covered by this Privacy Shield Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

5. Data Integrity and Purpose Limitation

WFS takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current. WFS takes reasonable and appropriate measures to comply with the requirement under the Privacy Shield to retain Personal Data in identifiable form only for as long as it serves a purpose of processing, which includes WFS's obligations to comply with professional standards, WFS's business purposes and unless a longer retention period is permitted by law, and it adheres to the Privacy Shield Principles for as long as it retains such Personal Data.

6. Access

Data Subjects whose Personal Data is covered by this Privacy Shield Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the Privacy Shield Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). Requests for access, correction, amendment, or deletion should be sent to: lkelly@wfs.aero.

7. Recourse, Enforcement, and Liability

WFS's participation in the EU-U.S. Privacy Shield Framework is subject to investigation and enforcement by the Department of Transportation.

In compliance with the Privacy Shield Principles, WFS commits to resolve complaints about your privacy and our collection or use of your Personal Data. Data Subjects with inquiries or complaints regarding this Privacy Shield Policy should first contact WFS at: lkelly@wfs.aero.

WFS has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints under the EU-U.S. Privacy Shield Principles. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please contact the relevant DPAs (http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm) for more information and to file a complaint.

Under certain conditions detailed in the Privacy Shield, Data Subjects may be able to invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

WFS may be required to disclose EU-U.S. Personal Data in response to a lawful request by public authorities, including the need to meet national security or law enforcement requirements.

WFS agrees to periodically review and verify its compliance with the Privacy Shield Principles, and to remedy any issues arising out of failure to comply with the Privacy Shield Principles. WFS acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of Privacy Shield participants.

Changes to this Privacy Shield Policy

This Privacy Shield Policy may be amended from time to time consistent with the requirements of the Privacy Shield. Appropriate notice regarding such amendments will be given.