



# Privacy Policy

For Butterfly Air. Last update: 05 September 2025

We are committed to safeguarding the privacy of our customers. We will only use the information that we collect about you lawfully and in accordance with the UK General Data Protection Regulation (UK GDPR) current data protection legislation.

1) These are the main reasons why we collect and use data about our users:

- We collect personal data primarily to administer training courses
- We collect personal data for selection and assessment purposes
- To provide the services you sign up for, such as newsletters
- To carry out marketing analysis and send you communications when we have your permission, or when permitted by law

2) We think carefully about our use of personal data, and below you can find the details of what we do to protect your privacy. This policy covers, among other topics:

- Information about your rights and our obligations
- Clarity about our dealings with you and transparency about how we collect and use your personal data
- Commitments on how we protect your personal data
- Commitments on how we will facilitate your rights and respond to your questions.

We will continue to examine how we can provide more clarity to our users about our use of data.

3) About this privacy policy

This privacy policy explains how we (Butterfly Air) collect, use, share and transfer your personal data when you use the services provided by Butterfly Air.

Personal data is any information about you by which you can be identified. This can include information such as:

- your name, date of birth, email address, postal address, phone number, mobile number;
- debit card details;
- information about your device (such as the IP address, which is a numerical code to identify your device that can provide information about the country, region or city where you are based); and
- information relating to your personal circumstances and how you use our site and services.

Sometimes our site may contain links to third party sites and services. These sites and services have their own privacy policies. If you follow a link to a third party, you should read the privacy policy shown on their site.

4) Who we are and how to contact us



The data controller for our site is Butterfly Air. This means that we are responsible for deciding how and why we hold and use your personal data. If you want to contact us, please email [nick@butterfly-air.com](mailto:nick@butterfly-air.com)

#### What personal data we collect and how we use it

We collect personal data when you sign up for our services and when you browse our site. This information may be used to for the provision of services or for information about how you use our site.

When you contact us and/or sign up for a course we collect the following information from you:

- Name
- Postal address
- Email address
- Mobile, and/or landline numbers
- Financial details in order to process payments where applicable, and all data held is compliant with English Law, PCI-DSS regulations (this is the framework which card processing companies monitor and uphold strict standards to be adhered to for us, the Company, to be allowed to use those services). We also retain, for the purposes of processing direct debits, (or refunds), sort codes, bank account numbers if supplied and authority given.
- Other personal details supplied by you to the Company for the purposes of you being a candidate in a selection / assessment process or being an end user of our services.

When you use our sites or apps we may also use cookies or similar technology to collect extra data, including:

- your IP address – a numerical code to identify your device and which can provide information about the country, region or city where you are based;
- your browsing history of the content you have visited on our sites, including information on how you were referred to our sites via another website; and
- details of your devices, for example, the unique device ID, unique advertising ID and browsers used to access our content.

We will not collect special categories of data – such as information about your race, political opinions, religion, health or sexual orientation – unless you have chosen to provide that information to us.

#### 5) How we collect personal data

We collect personal data when you:

- Sign up to one of our courses online
- Are a candidate in one of our selection/ assessment processes
- When you contact us to express an interest in our services
- When you contact us via email, social media, our apps or similar technologies or when you mention us on social media.

#### 6) Why we use your personal data



We use personal data collected through our sites and apps for a number of purposes, including the following:

- To provide the services you sign up for such as training courses. We also use the personal data for related internal administrative purposes – such as our accounting and records – and to make you aware of any changes to our services.
- To send marketing communications when we have your permission, or when permitted by law.
- For statistical purposes such as analysing psychometric test results.
- To respond to your queries and to resolve complaints.
- For security and fraud prevention, and to ensure that our site is safe and secure and used in line with our terms of use.
- To comply with applicable laws and regulations.

#### *Legal grounds for using your personal data*

We will only use your personal data where we have a legal ground to do so. We determine the legal grounds based on the purposes for which we have collected and used your personal data. In every case, the legal ground will be one of the following:

- Consent: For example, where you have provided your consent to receive emails from us regarding your training course or service you have signed up. We may ask for additional consent to contact you about additional services. You have the legal right to unsubscribe at any point.
- Our legitimate interests: Where it is necessary for us to understand our clients in order to promote our services. For example, we will rely on our legitimate interest when we analyse what content has been viewed on our site so that we can understand how they are used. It is also in our legitimate interest to carry out marketing analysis to determine what products and services may be relevant to the interests of clients..
- Performance of a contract with you (or in order to take steps prior to entering into a contract with you): For example, where you have purchased a training course from us and we need to use your contact details and payment information in order to process your order.
- Compliance with law: In some cases, we may have a legal obligation to use or keep your personal data.

#### *Updating your personal data with us*

Please get in touch with us on [nick@butterfly-air.com](mailto:nick@butterfly-air.com) to update any of your personal data.

#### **7) Your personal data and other organisations**

Your name and contact details will primarily only be used internally within the Company. However, for example, if as part of you undertake attendance at one of our training courses, we are obliged, for security purposes, to pass some of this information onto the security personnel if our training course is held in a restricted location. We may also pass on your information when carrying out selection and assessment services on behalf of another organisation that you have applied to. Additionally, if you purchased goods from us, your data would be shared with other of our stakeholders, eg. courier service providers.

We utilise third-party services to enhance the experience of our products.



#### Use of AI Analysis Services:

To provide advanced analysis features within our app, we may share certain user data with ChatGPT, an AI service provided by OpenAI. This data is shared solely for the purpose of delivering AI-powered analysis to users. Under our agreement with OpenAI, any data shared with ChatGPT is not used to train OpenAI's models or for any purpose other than providing the requested analysis. No user data is shared for monetary gain or sold to third parties. This process maintains user privacy, and data is not retained by OpenAI beyond the scope of providing the analysis service.

#### Use of Location Data for Weather Services:

With your consent, we may access your device's location to provide local weather information within the app. Location data is shared with OpenWeatherMap solely for the purpose of retrieving relevant weather data. No other personal data is transmitted to OpenWeatherMap, and your location is used exclusively to deliver weather-related services as requested by you.

8) When viewing our material through social media platforms, they may collect information about you on their site. For more information on how these organisations use personal data, please read their privacy policies.

#### 9) Sale or Passing of Personal Data to Third Parties

Other than for specific purposes as required by suppliers/stakeholders (as outlined above), we will not sell or pass your personal data to any commercial or regulatory organisation without your explicit consent.

#### Transfer of Personal Data Outside the EEA (European Economic Area)

Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you. Once the United Kingdom has exited the EU and/or EEA, English Law will take precedence.

**Sensitive Personal Data.** We will never collect sensitive personal data about you without your explicit consent and a clear explanation why it is required.

#### 10) Retention of Personal Data

We will continue to retain your name and other relevant details required to support our historical records.

#### 11) How long we keep your personal data

We keep your personal data for only as long as we need to. How long we need your personal data depends on what we are using it for, as set out in this privacy policy. For example, we may need to use it to answer your queries about a product or service and as a result may keep personal data while you are still using our product or services. We may also need to keep your personal data for accounting purposes, for example, where you have bought a subscription. If we no longer need your data, we will delete it or make it anonymous by removing all details that identify you. If we have asked for your permission to process your personal data and we have no other lawful grounds to



continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing in future.

## 12) How we may contact you

### *Service communications*

From time to time we may send you service emails, for example, telling you further information about your training course.

### *Marketing communications and editorial newsletters*

If we have your permission, we may send you materials we think may interest you, such as new training courses or products.

You can decide not to receive these emails at any time and will be able to “unsubscribe” by emailing [nick@butterfly-air.com](mailto:nick@butterfly-air.com) and informing us of your intent.

### *Market research*

Sometimes we may contact you for market research purposes, for example about a satisfaction survey. You can opt out from being contacted in this way by emailing us on [nick@butterfly-air.com](mailto:nick@butterfly-air.com) and asking to be removed from future market research.

### *Responding to your queries or complaints*

If you have raised a query or a complaint with us, we may contact you to answer your query or to resolve your complaint.

## 13) Cookies and similar technology

When you visit our sites or when you use our apps, we may collect personal data from you automatically using cookies or similar technology. A cookie is a small file that can be placed on your device that allows us to recognise and remember you.

## 14) Your rights with regard to the personal data that we hold about you

You can contact us with regard to the following rights in relation to your personal data:

- If you would like to have a copy of the personal data we hold on or if you think that we hold incorrect personal data about you, please write to [nick@butterfly-air.com](mailto:nick@butterfly-air.com). We will deal with requests for copies of your personal data or for correction of your personal data within one month. If your request is complicated or if you have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.



- Where you have provided us with consent to use your personal data, you can withdraw this at any time.
- You also have the right to ask us to delete your personal data or restrict how it is used. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request. Where applicable, you have the right to object to processing of your personal data for certain purposes.

If making any of these requests, we may need to request specific information from you to help us confirm your identity.

#### 15) Contact us for information about how we use your personal data

If you have any questions about how we use your personal data or if you have a concern about how your personal data is used, please contact [nick@butterfly-air.com](mailto:nick@butterfly-air.com).

Complaints will be dealt with and responded to within 30 days.

If you are not satisfied with the way your concern has been handled, you can refer your complaint to the Information Commissioner's Office (ICO):

- ICO helpline number: 0303 123 1113.
- ICO website: [www.ico.org.uk](http://www.ico.org.uk)

If you have a question about anything else, please see our Contact us page.

#### 16) Changes to the Privacy Policy

If we decide to change our privacy policy we will post the changes here. If the changes are significant, we may also choose to email all our registered users with the new details. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your data.

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