PRIVACY POLICY

This Privacy Policy (hereinafter: "**Policy**") contains information on the processing of your personal data in connection with the use of the "320 EXPLAINAIR" , operating at the Internet address ww.320explainair.com (hereinafter: "**Application**").

Any capitalized terms not otherwise defined in the Policy shall have the meaning given to them in the Terms and Conditions, available at: ww.320explainair.com.

Personal data Controller

The Controller of your personal data is HTS AVIATION TRAINING Sp. z o.o. company with its registered office in Warszawska 40 /2A, 40-008 Katowice, Poland, entered into the register of entrepreneurs of the National Court Register kept by the District Court of Warsaw Commercial Division of the National Court Register under KRS number: , with a NIP: 0001094185, REGON: 528063730, having a share capital of 5000 PLN (five thousand Polish Zlotys) paid in full (hereinafter: "**Controller**").

Contact with the Controller

In all matters related to the processing of personal data, you can contact the Controller via:

a) e-mail- at: contact@320explainair.com
b) traditional mail - at: HTS AVIATION TRAINING Sp. z o.o., Warszawska 40 /2A, 40-008 Katowice, Poland

Personal data protection measures

The Controller applies modern organizational and technical safeguards to ensure the best possible protection of your personal data and guarantees that it processes them in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "**GDPR**"), the Act of 10 May 2018 on the Protection of Personal Data and Other Personal Data Protection Regulations.

Information on the personal data processed

The use of the Application requires the processing of your personal data. Below you will find detailed information about the purposes and legal grounds of processing, as well as the period of processing and the obligation or voluntariness to provide them.

Purpose of processing	Personal data processed	Legal basis
Conducting a verification procedure and considering appeals against decisions on dealing with	1) name and surname/business name, 2) contact details, including e-mail address	Article 6(1)(c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Controller is subject, in this case the following obligations:

unacceptable content		– provide a mechanism for reporting inappropriate content (Article 16 of Regulation 2022/2065 on the single market for digital services and amending Directive 2000/31/EC (Digital Services Act)(hereinafter: "DSA"), (Article 20 of the DSA).
Providing the above-mentioned personal data is a condition for receiving a response to the report or exercising the User's rights under the provisions of the DSA (their provision is voluntary, but the consequence of failure to provide them will be the inability to receive a response to the report and the exercise of the above-mentioned rights). The Controller will process the above-mentioned personal data for the duration of the complaint procedure, and in the case of exercising the above-mentioned rights of the User – until their limitation expires.		

Profiling

The Controller does not process your personal data for advertising profiling or cross-app tracking purposes. Your personal data is only used to provide and improve the Application's functionality

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Controller:

a) hosting company;
b) providers of online payment systems;
c) newsletter service provider;
d) service providers supporting the technical operation of the Application (e.g. hosting, payment processing, accounting). Where analytics tools are used, they are anonymized and do not track individual users across other apps or websites

e) a company providing accounting services;

In addition, personal data may also be transferred to public or private entities, if such an obligation results from generally applicable law, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the Controller's use of the services provided by Google LLC, your personal data may be transferred to the following third countries: Great Britain, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

– in the case of the United Kingdom, Canada, Israel and Japan - a decision of the European Commission stating an adequate level of protection of personal data in each of the above-mentioned third countries;

– for the USA, Chile, Brazil, Saudi Arabia, Qatar, India, China, South Korea, Singapore, Taiwan (Republic of China), Indonesia and Australia, adequacy contractual clauses in line with the standard contractual clauses set out in Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council.

You can obtain from the Controller a copy of the data transferred to a third country.

Permissions

In connection with the processing of personal data, you have the following rights:

1) the right to be informed what personal data concerning you is processed by the Controller and to receive a copy of this data (the so-called right of access). Issuing the first copy of the data is free of charge, for subsequent copies the Controller may charge a fee;
2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
3) in certain situations, you can ask the Controller to delete your personal data, e.g. when:
    a) the data will no longer be needed by the Controller for the purposes of which it has informed;
    b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
    c) the processing is unlawful;
    d) the need to delete the data results from a legal obligation to which the Controller is subject;
4) if personal data is processed by the Controller on the basis of the consent granted to the processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another Controller;
5) if personal data is processed by the Controller on the basis of your consent to the processing, you have the right to withdraw this consent at any time (the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal);
6) if you believe that the processed personal data are incorrect, their processing is unlawful, or the Controller no longer needs certain data, you can request that for a specified period of time (e.g. checking the correctness of the data or pursuing claims) the Controller does not perform any operations on the data, but only stores them;
7) you have the right to object to the processing of personal data based on the legitimate interest of the Controller. In the event of an effective objection, the Controller will cease to process personal data for the above-mentioned purpose;
8) you have the right to lodge a complaint with the President of the Office for Personal Data Protection if you believe that the processing of personal data violates the provisions of the GDPR.

Cookies

1. The Controller informs that the Application uses “cookies” installed on your end device. These are small text files that can be read by the Controller’s system.
2. The Controller uses cookies exclusively for the following purposes:

a) Ensuring proper operation of the Application – cookies allow the Application to operate securely and efficiently, use its core functions, and maintain session continuity.

b) Improving user experience – cookies may help detect technical errors and improve the performance and stability of the Application.

c) Anonymous statistical analysis – cookies may be used to collect aggregated, anonymized information about the manner in which Users use the Application. This information is used solely for internal analysis to enhance usability and does not identify individual Users.

3. The Application does not use cookies for advertising, marketing, or behavioral tracking purposes. No cookies are used to profile users or to track their activities across other applications or websites.
4. The Controller may place both permanent and temporary (session) cookies on your device. Session cookies are deleted when you close your browser, while persistent cookies remain until deleted by the User or until their set expiration.
5. Through most commonly used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation in the future. Disabling or limiting the use of cookies may affect certain functionalities of the Application, but will not prevent its basic operation.

Final provisions

To the extent not regulated by the Policy, the generally applicable provisions on the protection of personal data shall apply.

The Application does not use 'tracking' as defined by Apple's App Store guidelines and does not share data with advertisers or data brokers.

The policy is effective from 7th September 2025.