

XTIA Online Privacy Notice

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Who We Are

XTI Aerospace, Inc. (XTIA, we, our, or us) values your privacy and the protection of your Personal Data. This Privacy Notice (**Notice**) explains how we collect, store, use, share, transfer, delete, and otherwise process information collected from or about you known as **Personal Data** (defined further below in this Notice). As an entity with international operations, XTIA has offices in different countries that may be responsible for the Personal Data they process, and we process Personal Data in accordance with these laws.

Purpose of this Privacy Notice

This Notice describes the types of Personal Data that XTIA may collect or process, how we may use and disclose that Personal Data, how you may exercise any rights you may have regarding our processing of your Personal Data, and how you can contact us if you would like to exercise them or if you have any questions or concerns.

This Notice applies to Personal Data collected or processed by us:

- Through online activities and services we offer (through our website, newsletters, email, social media, and otherwise) (**Online Services**);
- When we engage with you as a prospective or actual consumer of goods we market (**Products**);
- In other situations where you interact with us, including but not limited to interacting with us by visiting our offices or attending our events (**Events**) (our Online Services and Events are collectively called **Services** in this Notice);
- When we undertake employment recruiting activities; or
- Anywhere this Notice is posted or referenced.

XTIA may provide you with a different privacy notice in certain specific situations, in which case that privacy notice or policy will apply to the Personal Data collected or processed in that specific situation, rather than this one.

If you provide us with Personal Data related to anyone other than yourself, please note that you are responsible for complying with all privacy and data protection laws prior to providing that information to XTIA (including collecting consent, if required).

The XTIA entity with whom you or your employer is interacting or the XTIA entity who owns and operates the Services is, where applicable, the entity responsible for the collection and use of your Personal Data (known in some jurisdictions as the “controller”).

Please review this Notice carefully. To the extent permitted by law, by providing us your Personal Data or otherwise interacting with us, you are agreeing to this Notice. If you do not agree with our policies and practices, it is your choice not to use our Services or otherwise engage with us.

Personal Data Collected, Purposes, and Recipients

What is Personal Data?

Personal Data is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link to or associate with a specific individual, such as a name, address, email address, or telephone number. Personal Data in some countries can include information that indirectly identifies a person, even absent other identifying information.

Personal Data may include information considered sensitive in some countries, such as biometric information, genetic information, health information, financial account information, specific geolocation, ethnic or racial origin, information concerning your sex life or your sexual orientation, social security number, driver’s license number, state identification card number, passport number, and other similar information. Personal Data that could be considered sensitive Personal Data under any law is indicated with a caret (^) in the chart below.

We will process any Personal Data we collect in accordance with law and as described in this Notice (unless, as explained above, a separate policy or notice governs). In some circumstances, if you do not provide us with certain Personal Data, there may be some Products or Services that are unavailable to you.

The below table is a high-level summary of the types of Personal Data we may collect from you. Following that high-level summary is additional detail and information on how we collect, process, and use Personal Data and the potential recipients of your Personal Data, now and in the preceding 12 months. Some countries require us to state the legal bases for processing your Personal Data, which are the legally recognized reasons for processing your Personal Data, but please note that not all countries recognize all legal bases. The types of Personal Data we collect and disclose depends on your relationship with XTIA. Not all of the categories listed in the following charts may apply to you. Conversely, more than one of the categories may apply to you. If the nature of your relationship with XTIA changes, additional categories of Personal Data may also apply. XTIA does not use or disclose Personal Data or sensitive Personal Data other than for the purposes specified herein.

	Identity and Contact Information	Demographic Information	Video, Audio, and Recorded Information	Technical or Electronic Network Activity Information	Commercial and Financial Information	Professional, Employment, and Educational Information	Anonymized / De-Identified Data
	This may include name, email, phone number, etc.	This may include characteristics of protected classifications under some laws and may include age, gender, disability, etc.	This may include photos, video, call, or chat recordings, etc.	This may include Internet Protocol (IP) address, browser, device type, etc.	This may include financial information, etc.	This may include job title or position, employer, etc.	Data that removes individual personal data
Users of Online Services	X		X^	X		X	X
Our Customers	X			X	X^		
Users Interacting with Us Through the Investor Portal	X		X^	X	X^	X	X

Individuals Who Contact Us	X		X^	X		X	X
Service Providers and Their Employees, Agents, and Contractors	X		X^	X	X^	X	X
Attendees and Participants at Events	X	X^	X^	X		X	X
Employment and Apprenticeship Candidates	X	X^	X^	X		X	X
Children*							

Personal Data that may be considered sensitive is noted with a “^”. If required to do so, we will obtain your consent prior to processing your sensitive data.

*XTIA does not knowingly process Personal Data of children in connection with its provision of its Products or the Services.

Users of Online Services



We may process your Personal Data by (1) engaging with online activities and services we offer through this and other of our websites, email, online channels, including through social media, and otherwise; (2) interacting with our website(s); (3) signing up for our newsletters or other informational or marketing materials; (4) contacting us through phone, email, or otherwise; and/or (5) completing a survey or other online questionnaire or form.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



Identity and contact information, such as:



- first and last name or unique pseudonym
- honorifics and titles, preferred form of address
- employer / company
- email address
- postal address
- phone number username or code and password[^], security answers[^], and user preferences

Video, Audio, and Recorded Information, such as:

- Still images[^]
- Video[^]
- recordings of online events[^]
- recordings of your interactions with our Online Services, whether through email or otherwise

Technical or electronic network activity information, such as:

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- date and time you use our Online Services

	<ul style="list-style-type: none"> • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity and online behavior while on our Online Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages • data collected from cookies or other similar technologies***
Professional employment and educational information, such as:	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal • working location • graduate degrees • certifications • responses to surveys and questionnaires • enrolment history for our education and training events • records of collaborations with XTIA
Anonymized / de-identified data:	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
Where do we get the data? 	
<ul style="list-style-type: none"> • you directly • those authorized to provide Personal Data on your behalf, such as your authorized representative(s) • your devices • our security systems • business partners and other third parties that assist us in providing and improving our Services 	
Why do we process the data? 	

- to provide you with our Online Services
- to communicate with you
- to administer our relationship with you and/or your organization
- to send you updates
- to identify and authenticate you
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Online Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- in preparation for or to perform a contract with you
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our affiliates
- your company / employer
- individuals or entities that you designate or instruct us to share your Personal Data with
- authorized representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs

- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration**

Our Customers



We may process your Personal Data when you are a prospective or actual consumer of our Products and Services.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



Identity and contact information, such as:

- first and last name or unique pseudonym
- honorifics and titles, preferred form of address
- employer / company
- email address
- postal address
- phone number username or code and password[^], security answers[^], and user preferences

Technical or electronic network activity information, such as:

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- date and time you use our Online Services
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services
- activity and online behavior while on our Online Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages

	<ul style="list-style-type: none"> • data collected from cookies or other similar technologies***
Commercial and financial information, such as:	<ul style="list-style-type: none"> • Products and/or Services obtained or considered • request documentation • customer service records • financial transaction history • financial account number^ • bank account number and details^ • other payment information • tax identification number^
Anonymized / de-identified data:	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
Where do we get the data? +	
<ul style="list-style-type: none"> • you directly • your employer, company with which you are associated, or principal • your devices • our security systems (including CCTV) • third parties that provide access to information you make available, such as social media companies • business partners or other third parties that assist us in providing and improving our Products and Services 	
Why do we process the data? +	
<ul style="list-style-type: none"> • to provide you with our Products and Services • to communicate with you • to administer our relationship with you and/or your organization 	

- to send you updates
- to identify and authenticate you
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Products and Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- in preparation for or to perform a contract with you
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our affiliates
- your company / employer
- individuals or entities that you designate or instruct us to share your Personal Data with
- authorized representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Products and/or Services or help us improve our marketing or administration**

Users Interacting with Us Through the Investor Portal



We may process your Personal Data when you request information or services from us in your capacity as an existing or potential investor in the Company.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



Identity and contact information, such as:	<ul style="list-style-type: none">• first and last name or unique pseudonym• honorifics and titles, preferred form of address• employer / company• email address• postal address• phone number• username or code and password[^], security answers[^], and user preferences
Demographic information, such as:	<ul style="list-style-type: none">• preferred language• gender• citizenship and/or country of origin[^]
Video, Audio, and Recorded Information, such as:	<ul style="list-style-type: none">• still images[^]• video (including via CCTV)[^]• recordings of your calls with our attorneys or representatives, with your consent• voicemails• recordings of your interactions with our Online Services, whether through email or otherwise
Technical or electronic network activity information, such as:	<ul style="list-style-type: none">• Internet Protocol (IP) addresses (which may identify your general geographic location or company)• browser type and browser language

	<ul style="list-style-type: none"> • device type • date and time you use our Online Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity and online behavior while interacting with our Online Services and referring websites or applications, including forms and other information submitted, your clicks on our site pages • data collected from cookies or other similar technologies***
<p>Commercial and financial information, such as:</p>	<ul style="list-style-type: none"> • request documentation • financial transaction history • financial account number^ • bank account number and details^ • other payment information • tax identification number^
<p>Professional employment and educational information, such as:</p>	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal • working location • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • enrolment history for our education and training events • records of collaborations with XTIA • information from references • background checks^
<p>Anonymized / de-identified data:</p>	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or

identifiable and the information is no longer considered Personal Data under data protection laws

Where do we get the data?



- you directly
- your employer, company with which you are associated, or principal
- your devices
- our security systems
- third parties that provide access to information you make available, such as social media companies
- business partners or other third parties that assist us in providing and improving our Services

Why do we process the data?



- to provide you with our Services
- to communicate with you
- to administer our relationship with you and/or your organization
- to send you updates
- to identify and authenticate you
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance and to assist in training and development
- to procure third-party products and services, including to manage and satisfy related third-party contractual obligations
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in preparation for or to perform a contract with you
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our Affiliates
- your company / employer
- your references and third parties that assist us in conducting background checks
- authorized legal representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration**

Individuals Who Contact Us



We may process your Personal Data when you contact XTIA either offline or via our Online Services.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



<p>Identity and contact information, such as:</p>	<ul style="list-style-type: none"> • first and last name or unique pseudonym • honorifics and titles, preferred form of address • employer / company • email address • postal address • phone number • company ID number such as account number
<p>Video, Audio, and Recorded Information, such as:</p>	<ul style="list-style-type: none"> • still images[^] • video (including via CCTV)[^] • recordings of your calls with our representatives • voicemails • recordings of your interactions with our Online Services, whether through email or otherwise
<p>Technical or electronic network activity information, such as:</p>	<ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • date and time you use our Online Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity and online behavior while interacting with our Online Services and referring websites or applications, including forms and other information submitted, your clicks on our site pages • data collected from cookies or other similar technologies^{***}
<p>Professional employment and</p>	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal • working location • work skills

<p>educational information, such as:</p>	<ul style="list-style-type: none"> • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • enrolment history for our education and training events • records of collaborations with XTIA • information from references
<p>Anonymized / de-identified data:</p>	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
<p>Where do we get the data? ⊕</p>	
<ul style="list-style-type: none"> • you directly • your employer, company with which you are associated, or principal • your references and third parties • your devices • our security systems (including CCTV) • third parties that provide access to information you make available, such as social media companies • business partners or other third parties that assist us in providing and improving our Services 	
<p>Why do we process the data? ⊕</p>	
<ul style="list-style-type: none"> • to provide you with our Products and/or Services • to communicate with you • to administer our relationship with you and/or your organization • to send you updates • to identify and authenticate you 	

- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Products and Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance and to assist in training and development
- to procure third party products and services, including to manage and satisfy related third party contractual obligations
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in preparation for or to perform a contract with you
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our Affiliates
- your company / employer
- authorized legal representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration**

Service Providers and Their Employees, Agents, and Contractors



We may process your Personal Data if you are a current XTIA business partner, service provider, or vendor, or an employee, agent, or contractor of the same.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



Identity and contact information, such as:	<ul style="list-style-type: none">• first and last name or unique pseudonym• honorifics and titles, preferred form of address• employer / company• email address• postal address• phone number• company ID number such as account number• username or code and password[^], security answers[^], and user preferences
Demographic information, such as:	<ul style="list-style-type: none">• preferred language
Technical or electronic network activity information, such as:	<ul style="list-style-type: none">• Internet Protocol (IP) addresses (which may identify your general geographic location or company)• browser type and browser language• device type• date and time you use our Online Services• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services• activity and online behavior while on our Online Services and referring websites or applications, including forms and other information submitted, and your clicks on our site pages• data collected from cookies or other similar technologies^{***}

<p>Commercial and financial information, such as:</p>	<ul style="list-style-type: none"> • request documentation • financial transaction history • financial account number^ • bank account number and details^ • other payment information • tax identification number^
<p>Professional employment and educational information, such as:</p>	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal • working location • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • enrolment history for our education and training events • records of collaborations with XTIA • information from references • background checks^
<p>Anonymized / de-identified data:</p>	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
<p>Where do we get the data? ⊕</p>	
<ul style="list-style-type: none"> • you directly • your employer, company with which you are associated, or principal • your references and third parties that assist us in conducting background checks 	

- your devices
- our security systems (including CCTV)
- third parties that provide access to information you make available, such as social media companies
- business partners or other third parties that assist us in providing and improving our Services

Why do we process the data?



- to provide you with our Services
- to communicate with you
- to administer our relationship with you and/or your organization
- to send you updates
- to identify and authenticate you
- to customize content for you and tailor your experience when using our Online Services
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services
- to improve our Products and Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance and to assist in training and development
- to procure third party products and services, including to manage and satisfy related third party contractual obligations
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in preparation for or to perform a contract with you

- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our Affiliates
- our customers
- your company / employer
- your references and third parties that assist us in conducting background checks
- third parties that assist us in conducting background checks
- authorized legal representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration**

Attendees and Participants at Events



We may process your Personal Data when you attend or participate in professional and educational events or conferences we sponsor or hold.

Examples of the types of data we process (*Personal Data that may be considered sensitive is noted with a “^”*)



<p>Identity and contact information, such as:</p>	<ul style="list-style-type: none"> • first and last name or unique pseudonym • honorifics and titles, preferred form of address • employer / company • email address • postal address • phone number • contact information for related persons • customer number • company ID number such as account number
<p>Demographic information, such as:</p>	<ul style="list-style-type: none"> • preferred language • disability[^] • date of birth
<p>Video, audio, and recorded information, such as:</p>	<ul style="list-style-type: none"> • still images • video (including via CCTV)
<p>Technical or electronic network activity information, such as:</p>	<ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • date and time you use our Online Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity and online behavior while on our Online Services and referring websites or applications, including forms and other information submitted, and your clicks on our site pages • data collected from cookies or other similar technologies^{***}
<p>Professional employment and</p>	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal

<p>educational information, such as:</p>	<ul style="list-style-type: none"> • working location • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • enrolment history for our education and training events • records of collaborations with XTIA
<p>Anonymized / de-identified data:</p>	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
<p>Where do we get the data? ⊕</p>	
<ul style="list-style-type: none"> • you directly • your employer, company with which you are associated, or principal • those authorized to provide Personal Data on your behalf • your devices • our security systems (including CCTV) • third parties that provide access to information you make available, such as social media companies • business partners or other third parties that assist us in providing and improving our Services 	
<p>Why do we process the data? ⊕</p>	
<ul style="list-style-type: none"> • to register you for the event or conference and other attendance-related purposes • to communicate with you • to administer our relationship with you and/or your organization • to send you updates 	

- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- advertising and promotion, including to contact you regarding programs, Services, and topics that may be of interest or useful to you
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- in preparation for or to perform a contract with you
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our Affiliates
- your company / employer
- other third parties attending the Events
- individuals or entities that you designate or instruct us to share your Personal Data with
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Events and Services or help us improve our marketing or administration**

Employment and Apprenticeship Candidates



We may process your Personal Data when you apply or are a candidate for employment or apprenticeship at XTIA.

Examples of the types of data we process



Identity and contact information, such as:	<ul style="list-style-type: none">• first and last name or unique pseudonym• honorifics and titles, preferred form of address• employer / company• email address• postal address• phone number• username or code and password[^], security answers[^], and user preferences• contact information for related persons, such as authorized users of your account or designated representatives• customer number• company ID number such as account number
Demographic information, such as:	<ul style="list-style-type: none">• age• gender• preferred language• disability[^]• date of birth• citizenship and/or country of origin[^]
Video, Audio, and Recorded	<ul style="list-style-type: none">• still images[^]• video[^]• recordings of your interactions with our Online Services, whether through email or otherwise

Information, such as:	
Technical or electronic network activity information, such as:	<ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • date and time you use our Online Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity and online behavior while on our Online Services and referring websites or applications, including forms and other information submitted, and your clicks on our site pages • data collected from cookies or other similar technologies***
Professional employment and educational information, such as:	<ul style="list-style-type: none"> • job title or position • your employer, company with which you are associated, or principal • working location • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • information from references • background checks^
Anonymized / de-identified data:	<ul style="list-style-type: none"> • Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under data protection laws
<p>Where do we get the data? ⊕</p>	

- you directly
- your employer, company with which you are associated, or principal
- your references and third parties that assist us in conducting background checks
- those authorized to provide Personal Data on your behalf
- your devices
- our security systems (including CCTV)
- third parties that provide access to information you make available, such as social media companies
- business partners or other third parties that assist us in providing and improving our Services and in hiring employees and contractors

Why do we process the data?



- to communicate with you
- to administer our relationship
- to send you updates, including with respect to updates on new employment opportunities
- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- to procure third party products and services, including to manage and satisfy related third party contractual obligations
- advertising and promotion, including to contact you regarding programs, Services, and topics that may be of interest or useful to you
- to comply with legal and regulatory obligations

What are the Lawful or Legal Bases of Processing?



- for the purposes of our legitimate interests
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights

- in preparation for or to perform a contract with you
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*

Who receives the data?



- XTIA, and our Affiliates
- your references
- individuals or entities that you designate or instruct us to share your Personal Data with
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- third parties that assist us in hiring and conducting background checks
- XTIA's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration**

Children



XTIA does not knowingly collect, maintain, disclose, or otherwise process Personal Data from minors below the age of 16 without the permission of such minor's parents or legal guardians.

*The legal bases relied upon by XTIA include those enumerated in Articles 6 and 9 of the European Union's General Data Protection Regulation (**GDPR**), Article 17 of the Personal Information Protection Act 2011 (**PIPA**), and Article 13 of the Personal Information Protection Law (**PIPL**). When required and allowed, we will seek to obtain your consent or authorization to process your Personal Data and only process your Personal Data upon receiving such consent. In such circumstances, your refusal to provide consent or authorization will have no adverse consequence on you. However, in some circumstances where consent is required, it may be

impossible for XTIA to manage its relationship with you or provide you with the Services absent your consent to process your Personal Data.

**In limited circumstances, recipients may include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, to the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Notice or required by law.

***Please see our Cookie Notice for more information on how we use cookies and similar technologies.

Marketing, Cookies, and Analytics

To the extent permitted by law, including with your consent where required, we may engage in the following activities:

- We may use your contact details to contact you to determine whether you would like to initiate a business relationship with us or to send you marketing emails. If you do not wish to receive such marketing emails, you may opt out by declining to receive such emails when registering, in our subsequent communications by following opt-out or unsubscribe instructions included in the email, by contacting us, or at other information collection points while using the Online Services.
- We may collect Personal Data automatically through cookies and other technologies to provide functionality to our Online Services; to recognize you across devices when using our Online Services; in each case where this is justified under applicable data protection law for our legitimate business purposes or with consent, where required. These legitimate business purposes include evaluating information about the use of our Online Services and identifying trends; developing or enhancing our Online Services; providing an experience tailored to you when you use our Online Services; effecting certain security controls; and, identifying the advertisements and offers we think may interest you so that we may display them to you when you use our Online Services.
- We do not engage in profiling subject to the privacy laws using Personal Data.
- We do not “sell” your Personal Data or share it for the purposes of cross-context behavioral (i.e., “targeted”) advertising or profiling nor do we process your sensitive Personal Data to infer characteristics about you. We do allow certain third parties to collect information about the users of our Services to provide valuable services to us, such as fraud detection, reporting, and analytics. This may include sharing information about your interactions with our Online Services, including information searched for or viewed in connection with our Online Services for the purposes of providing you with information related to your searches, queries, or other interactions with our Online Services.
- We also perform statistical analyses of the users of our Online Services to improve the functionality, content, design, and navigation of our Online Services.

You may be able to opt out of or revoke your consent to, as applicable, receiving web-based personalized advertisements from companies who are members of the Network Advertising Initiative by going to <http://optout.networkadvertising.org/?c=1> or participate in the Digital Advertising Alliance Self-Regulatory Program by going to <http://www.aboutads.info/>.

In addition, if you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. Visit <http://www.allaboutcookies.org/manage-cookies/index.html> for more information. If, however, you do not accept these cookies, you may experience some inconvenience in your use of the Online Services. For example, we may not be able to recognize your computer, and you may need to log in every time you visit.

Do-Not-Track Signals

Certain web browsers and other programs may transmit “opt-out” signals, also called a Global Privacy Control (or GPC) signals or Do-Not-Track signals (**GPC Signals**), to websites with which the browser communicates. Please note that we do not have the ability to recognize or honor GPC Signals or similar signals at this time. However, XTIA does not engage in targeted advertising or the sale of Personal Data.

Interactive Features of our Websites

To the extent we offer any public or group forums in connection with our Services, such as newsfeeds, blogs, message boards, chat or question functions, or similar tools (**Interactive Features**), the posts or comments you make may be public and viewed by others. You should use care before posting information about yourself, including Personal Data. Because these are public postings, you should have no expectation of privacy or confidentiality in the content you submit to Interactive Features in connection with the Services. Your disclosure of any Personal Data through the Interactive Features is at your own risk.

Service Providers and Third Parties

Service providers or vendors (or processors) acting on our behalf must execute agreements requiring them to maintain confidentiality and to process Personal Data only to provide the services to us and in a way that aligns with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations. Our processors and subprocessors can be located in the United States, the UK, and Europe, among other locations.

Combination of Data with Data Received from Third Parties and Affiliates

We may combine information we collect, including Personal Data, with Personal Data that we may obtain from third parties. XTIA may jointly use your Personal Data to provide you with the Products or Services requested, including joint use with XTIA affiliates, as well as third parties who assist or partner with us to provide you with Products and Services. For the specific affiliates or third parties who may jointly use your data, please contact us.

Links to Other Websites

Our Online Services may contain links to other websites, applications, or services that are not owned or operated by XTIA. Such links do not imply an endorsement with respect to any third party, any website, or the products or services provided thereby. You should carefully review the privacy policies and practices of other websites and services as we cannot control and are not responsible for privacy policies, notices, or practices of third party websites, applications, and services.

Your Rights Regarding Your Personal Data

Depending on where you live, you may have the following rights with respect to some or all of your Personal Data:

- To request information about or explain whether, and how, we process your Personal Data
- To request access to and a copy of your Personal Data, including to provide your Personal Data directly to another organization (called, in some locations, a right to data portability)
- To request that we correct or update your Personal Data
- To request that we delete your Personal Data
- To request that we restrict, suspend, block, or to object to or opt-out of the processing of your Personal Data, including your sensitive Personal Data, including withdrawing consent
- To appeal the denial of a request; and
- To lodge a complaint with the data protection authority in your jurisdiction.

In the event you—or your authorized agent—wish to make a request to exercise any of these rights or to appeal the denial of one of your requests, please Contact Us. Even if you make a complaint to us, you may also in some jurisdictions lodge a complaint with the relevant privacy or data protection authority in your location. Upon rejection of an individual rights request you may also have the right to file a lawsuit in court in accordance with the law.

We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you with certain Services or it may otherwise affect the way we are able to interact with you.

We will make reasonable efforts to respond promptly to your requests. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Safeguarding Personal Data

Consistent with applicable laws and requirements, XTIA has put in place physical, technical, and administrative safeguards designed to protect Personal Data from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our Services. In addition, it is your responsibility to safeguard any passwords, identification or ID numbers, or similar individual information associated with your use of the Services.

How Long Your Personal Data Will Be Kept

We generally retain Personal Data for as long as needed for the specific purpose or purposes for which it was collected or obtained, and as outlined in this Notice. In some cases, we may be required to retain Personal Data for a longer period of time as required by law or for other necessary or required purposes. Whenever possible, we aim to de-identify or anonymize your Personal Data or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the length of time we need to keep your Personal Data; and (iii) whether retention is determined to be necessary for XTIA due to limitation periods, litigation, or other legal or regulatory obligations.

XTIA takes reasonable steps to securely dispose of Personal Data upon the expiration of retention periods, taking into consideration these litigation, legal, or regulatory obligations.

Transfer of Personal Data

We operate in various jurisdictions throughout the world, including, but not limited to, the United States, the UK, and the EU. Please be aware that Personal Data we collect and process may be transferred and maintained outside your state, province, country, or other jurisdiction, country, or location where the privacy laws may not be as protective as those in your location, including the United States. XTIA has put in place lawful transfer mechanisms and appropriate safeguards, in accordance with its legal requirements, to protect your Personal Data, including but not limited to Standard Contractual Clauses.

Changes to This Privacy Notice

We reserve the right to change this Notice from time to time. We will alert you when changes have been made by indicating the date this Notice was last updated as the date the Notice became effective or as otherwise may be required by law. It is recommended that you periodically revisit this Notice to learn of any changes.

Contact Us

If you have questions or comments about this Notice or about how your Personal Data is processed, or to exercise your privacy rights, please contact us by one of the methods below:

Email: privacyquestions@xtiaerospace.com
Mail: 8123 S. InterPort Boulevard
Englewood, CO 80112
Phone: **800 680 7412**