

Privacy Policy

Last Updated:	Monday, 9 December 2024
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We’re committed to protecting your personal information *and* your right to privacy. When you visit our Website (<https://walkerair.us>) and use our Services, you trust us with your personal information. As a result, we take your privacy very seriously.

Our *Privacy Policy* has been developed using the Articles of the internationally-recognized *General Data Protection Regulation | GDPR* (<https://gdpr-info.eu/>) as a guide, and they apply to all information collected through our Website and/or any related services, sales, marketing or events, collectively referred to in this document as our "Services".

In this document, we seek to explain to you, in the clearest and most direct way possible, what information we collect, how we use it and what rights you have in relation to it. By reading through it carefully, you’ll be better prepared to make informed decisions about sharing your personal information with us.

If you disagree with any of this Policy’s terms and/or conditions, discontinue using our Sites and our services.

Direct any questions, comments or concerns to us you have about this *Policy* – **or** – our practices related to the collection and/or handling of your personal information – by submitting a **Help Ticket**.

Summary | Overview

1.	WHAT INFORMATION DO YOU COLLECT? Personal information you disclose to us <i>We collect personal information you provide to us – such as name, address, contact information, passwords and security data.</i> Information automatically collected from you <i>Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our websites.</i>
2.	HOW DO YOU USE MY INFORMATION? <i>We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you and compliance with our legal obligations and/or your consent.</i>

3.	<p>WILL MY INFORMATION BE SHARED WITH ANYONE?</p> <p><i>We only share information with your consent to comply with laws, provide you with services, protect your rights and/or fulfill business obligations.</i></p>
4.	<p>DO YOU USE COOKIES AND OTHER TRACKING TECHNOLOGIES?</p> <p><i>We may use cookies and other tracking technologies to collect and store your information.</i></p>
5.	<p>HOW LONG DO YOU KEEP MY INFORMATION?</p> <p><i>We keep your information for as long as necessary to fulfill the purposes outlined in this Policy unless/until otherwise required by law.</i></p>
6.	<p>HOW DO YOU KEEP MY INFORMATION SAFE?</p> <p><i>We seek to protect your personal information through a system of organizational and technical security measures.</i></p>
7.	<p>WHAT ARE MY PRIVACY RIGHTS?</p> <p><i>In some regions – such as the European Economic Area – you have rights allowing you greater access to and control over your personal information. You may review, change or terminate your account at any time.</i></p>
8.	<p>HOW IS A DATA BREACH HANDLED?</p> <p><i>You'll be notified about data breaches when we think you're likely to be at risk or serious harm.</i></p>
9.	<p>WHAT CONTROLS ARE THERE FOR DO-NOT-TRACK (DNT) FEATURES?</p> <p><i>We don't currently respond to DNT browser signals or any other mechanism automatically communicating your choice not to be tracked online.</i></p>
10.	<p>DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?</p> <p><i>Yes – residents of California are granted specific rights regarding access to their personal information.</i></p>
11.	<p>DO YOU EVER UPDATE THIS POLICY?</p> <p><i>Yes – we will update this Policy as necessary to remain in compliance with relevant laws.</i></p>
12.	<p>HOW CAN I CONTACT YOU ABOUT THIS POLICY?</p> <p><i>If you have questions or comments about this policy, submit a Help Ticket.</i></p>
13.	<p>HOW CAN I REVIEW, UPDATE OR DELETE THE DATA YOU COLLECT FROM ME?</p> <p><i>To review, update or delete your personal information, submit a Help Ticket.</i></p>

Policy Details

WHAT INFORMATION DO YOU COLLECT?

Personal information you disclose to us

We collect personal information you voluntarily provide us. What we collect depends on (1), the context of your interactions with us and the Services, (2), the choices you make, and (3), the features you use.

Pilot Application Form

When you complete and submit the *Pilot Application Form*, you will be voluntarily providing us with your personal information. The information you enter is encrypted – as noted by the `https://` prefix in its address on the Website – *before* it's submitted to us. While we've implemented encryption to ensure the secure transmission of your personal information, Internet-based data transmissions may, in principle, have security gaps. Absolute protection, therefore, may not be guaranteed. For this reason, you're always welcome to contact us via alternative means – such as email.

On the *Pilot Application Form*, we collect the following information about you:

- Your first and last name (we do not validate the legitimacy of provided data, this can be a fake name);
- Your email address;
- Your geographic location (country of residence);
- Your IVAO, PilotEdge, or VATSIM IDs;
- Your IP address.

On your *Pilot Profile*, we collect the following information if you choose to share it, in addition to what was collected on your *Pilot Application Form*.

- Your Steam, Twitch, Xbox, and YouTube IDs.

Email

We communicate with you via email processed through *Google Workspace*. By completing the *Pilot Application Form*, you consent to receiving occasional service-related email communications from us. You can opt out of receiving them by submitting a **Help Ticket**. It's important to note, however, doing so will prevent you from receiving information and updates on our company and its operations. That may compromise the level of service quality you receive and your enjoyment of the overall experience.

The use of *Google Workspace*, as well as its relevant data transfer and processing, is governed by *Google's Data Protection Policy*.

Link: <https://policies.google.com/privacy?hl=en>

TFDi Design | smartCARS 3 and FlightTrackerXP

We use flight tracking software – *smartCARS 3* and *FlightTrackerXP* (X-Plane only) – to document flights. They serve as the interface for the data exchange between your flight simulator and our *Flight Data System* Software. In order to function properly, they require access to your computer system to facilitate the real-time flow of data while you're flying.

The operation of smartCARS 3 is governed by TFDi Design's *Privacy Policy*.

Link:

<https://www.tfdidesign.com/legal.php?request=pp>

The operation of FlightTrackerXP is governed by its Developer's *Privacy Policy*.

Link: **<https://discord.com/invite/GF9sEdE>**

Discord

Discord is a proprietary freeware VoIP application and digital distribution platform designed for creating online communities and facilitating interaction among its participants. While not mandatory, our Pilots are nonetheless encouraged to have and maintain a presence there to foster a sense of community and enhance their overall Company experience. The use of *Discord* is governed by their *Privacy Policy*.

Link: **<https://discord.com/privacy>**

The personal information we collect and store include the following:

- **Unique Discord Snowflake ID**

A Discord user ID is a unique eighteen or nineteen-digit number and is not the same as your username.

All personal information you provide us must be true, complete and accurate - and you must notify us of any changes to such personal information.

International Virtual Aviation Organization (IVAO)

IVAO is an online virtual Air Traffic Control (ATC) network, and while our Pilots are encouraged to use online ATC networks, it's **not** mandatory they do so. Their actions are governed by their *Privacy Policy*.

Link: **<https://wiki.ivao.aero/en/home/ivao/privacypolicy>**

They record information about their Users. As a User, you can request that data be retrieved and deleted by visiting this URL:

<https://www.ivao.aero/ContactGDPR.asp>

Information Automatically Collected

We automatically collect certain information when you visit, use or navigate our Services. This information does **not** reveal your specific identity – like your name or contact information – but *may*

include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is needed primarily to maintain the security and operation of our Services and for internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

Online Identifiers

We collect cookies – or others such as the ones used for analytics and marketing – and other similar data.

HOW DO YOU USE MY INFORMATION?

We use personal information collected via our Services for a variety of business purposes described on the following page. We process your personal information for these purposes:

1. in reliance on our legitimate business interests;
2. in order to enter into or perform a contract with you, with your consent; and/or,
3. for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each listed purpose.

We store your information for the sole purpose of ensuring service quality and enhancing your overall experience while flying for the Company. Some of your personal information (first name and initial of last name) will be displayed on the front page (public) and in other areas (private | “Crew Only”) of the Website. Displaying this information is a vital part of establishing and maintaining a strong sense of community and fosters interaction among our Pilots.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third party account – such as your *Google* or *Facebook* account, for example – we use the information you allowed us to collect from those third parties to facilitate account creation and the logon process for the performance of the contract.
- **To send administrative information to you.** We may use your personal information to send you service and new feature information and/or information about changes to our terms, conditions and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure – for example, for fraud monitoring and prevention.
- **To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual Obligations.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To manage user accounts.** We may use your information for the purposes of managing your account and keeping it in working order.
- **To deliver services to the user.** We may use your information to provide the service

you requested.

WILL MY INFORMATION BE SHARED WITH ANYONE?

We may process or share data based on the following legal basis:

- We may process your data if you've given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests.** We may process your data when it's reasonably necessary to achieve our legitimate business
- **Performance of a Contract.** Where we've entered into a contract with you, we may process your personal information to fulfill the terms of our
- **Legal Obligations.** We may disclose your information where we're legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order or legal process, such as in response to a court order or a subpoena – *including* in response to public authorities to meet national security or law enforcement
- **Vital Interests.** We may disclose your information where we believe it's necessary to investigate, prevent or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities or as evidence in litigation in which we're

More specifically, we may also need to process your data or share your personal information in the event of a business transfer. As necessary, we may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.

DO YOU USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

Cookies are small text files containing user IDs automatically placed on your computer or other device when you visit a Website. They're stored by your Internet Browser. The Browser sends the Cookies back to the Website on each subsequent visit, allowing the Website to recognize your computer or device. This recognition enables the Website provider to observe your activity on the Website, deliver a personalized, responsive service and improve functionality. We may also use cookies and similar tracking technologies – like web beacons and pixels – to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our **Cookie Policy Addendum**.

HOW LONG DO YOU KEEP MY INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this document, unless a longer retention period is required or permitted by law – such as tax, accounting or other legal requirements. No purpose in this policy will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we've no ongoing legitimate business need to process your personal information, we'll either delete or anonymize it – or, if this isn't possible (for example, because your personal information has been stored in backup archives) – we'll securely store your personal information

and isolate it from any further processing until deletion is possible.

HOW DO YOU KEEP MY INFORMATION SAFE?

We've implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We cannot, however, guarantee the Internet itself is 100% secure. Although we'll do our best to protect your personal information, its transmission to and from our Services is at your own risk. **You should only access the Services within a secure environment.**

WHAT ARE MY PRIVACY RIGHTS?

In some regions – like the *European Economic Area*, for instance – you may have certain rights under the *General Data Protection Regulations (GDPR)* and/or other applicable data protection laws.

*While our Privacy Policy is **not** governed by the GDPR, we support its intent. Learn more about it [here](#).*

These rights may include:

- **The right to be informed.**
The Company is completely transparent in how it uses your personal data.
- **The right to access.**
You have the right to know exactly what information is collected and held about you – and how it's processed.
- **The right to rectification (correction).**
You are entitled to have your personal data rectified if it's inaccurate or incomplete.
- **The right to erasure (to be forgotten).**
You have a right to having your personal data deleted or removed without the need for a specific reason as to why you wish to have that done.
- **The right to restriction of processing.**
You have a right to block or suppress the processing of your personal data.
- **The right to data portability.**
You have the right to retain and reuse your personal data for your own purpose.
- **The right to object.**
You have the right to object to your personal data being used for purposes not disclosed to you.
- **The right to not be subject to automated decision making.**
You are protected against the risk a potentially damaging decision is made without human intervention.

If you wish to exercise any of these rights, submit a **Help Ticket**. We'll act upon your request appropriately in accordance with applicable data protection laws.

Exercising a number of these rights may impact your ability to function as a Pilot for our Company. In these cases, asking to exercise them would be considered a request for termination.

If you reside in the *European Economic Area* and believe we're unlawfully processing your personal information, you also have the right to complain to your local data protection Supervisory Authority.

Contact details: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If we're relying on your consent to process your personal information, you have the right to withdraw your consent at any time. This, however, will **not** affect the lawfulness of the processing before its withdrawal.

*Our ability to process your personal information is necessary in order for you to access the features and functionality of our website and Flight Data System platform. Our inability to do so will **not** enable you to continue as a Pilot for our Company. Therefore, if you withdraw your consent allowing us to use your personal information, you'll be terminated.*

Submit a **Help Ticket** with any questions or comments you have about your privacy rights.

Account Information

If, at any time, you'd like to review or change the information in your account or terminate it, submit a **Help Ticket**. Upon receiving your request, we'll provide you a means to (1), review your information, and (2), change it. If you've requested we terminate your account, we'll deactivate and/or delete it and any related information from our active databases. Some information, however, may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Cookies and Similar Technologies

By continuing to use our Website, you accept our use of the following cookies:

Google Analytics

We use *Google Analytics* to provide us with information about how our Website is used, such as what countries our visitors are browsing from and what pages are the most popular. The data gathered is anonymous and cannot be used to identify individual users. You may block the collection of the data generated by the cookie and the data related to your use of the Website – including your IP address – by *Google*, as well as their ability to process it, by downloading and installing a browser plugin from the link.

Link: <https://tools.google.com/dlpage/gaoptout?hl=en>

Google ReCAPTCHA

ReCAPTCHA is a service provided by *Google* allowing us to confirm only real people and not

spambots are able to submit our *Pilot Application* When you tick the “I’m not a robot” box, *Google* places a cookie called NID in your browser. It communicates information such as your browser’s language setting, the date, how many mouse clicks you have made on the screen and what other *Google* cookies you may have on your device.

Link: <https://developers.google.com/recaptcha>

Google Fonts

We use *Google Fonts API* to provide the font faces you see on this Website. When you use our Website, some data, including your IP address, will be transferred to and stored on *Google’s* servers in the USA. This data is used solely for the purpose of providing the service, and is not associated with other data *Google* may hold on you. The use of *Google Maps API* and *Google Fonts API*, as well as the relevant data transfer and processing, is governed by *Google’s* Data Protection Policy.

Link: <https://policies.google.com/privacy?hl=en>

DATA BREACH

A privacy breach occurs when there’s unauthorized access to or collection, use, disclosure or disposal of, personal information. You’ll be notified about data breaches when we think you’re likely to be at risk or serious harm, for example, when a data breach could likely result in serious financial harm or harm to your mental or physical well-being. In the event we become aware of a security breach which has resulted, or *may* result, in unauthorized access, use or disclosure of personal information, we will promptly investigate the matter and notify the appropriate Supervisory Authority no later than 72 hours after having become aware of it, *unless* the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we don’t currently respond to DNT browser signals or any other mechanism automatically communicating your choice not to be tracked online. If an online tracking standard is adopted in the future and we’re required to follow it, we’ll inform you about that practice in a revised version of this *Privacy Policy*.

DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

California Civil Code Section 1798.83 – also known as the “Shine The Light” law – permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with whom we shared personal information in the immediately preceding calendar year.

If you’re a California resident and would like to make such a request, submit a **Help Ticket**.

If you're under 18 years of age, reside in California and have a registered account with the Services, you have the right to request removal of unwanted data you publicly post on the Services. To request removal of such data, submit a **Help Ticket**. Include the email address associated with your account and a statement you reside in California. We'll make sure the data isn't publicly displayed on the Services. Be aware, however, the data may **not** be completely or comprehensively removed from our systems.

DO YOU EVER UPDATE THIS POLICY?

We may update this document from time to time. The updated version will be indicated by an updated *Version* date and it'll be effective as soon as it's accessible. If we make any material changes, we may notify you either by prominently posting a notice of such changes to our Services or by directly sending you a notification. We encourage you to review this *Privacy Policy* frequently to remain informed about how we're protecting your information.

HOW CAN I CONTACT YOU ABOUT THIS POLICY?

If you have questions or comments about this policy, submit a **Help Ticket**.

HOW CAN I REVIEW, UPDATE OR DELETE THE DATA YOU COLLECT FROM ME?

Based on the laws of some countries, you may, as mentioned above, have the right to request access to the personal information we collect from you, change that information or, in some circumstances, delete it. To make a request to review, update or delete your personal information, submit a **Help Ticket**. We'll respond to it within thirty (30) days.

Children's Protection Act

We act in accordance with the **Children's Online Privacy Protection Act**. Under the provisions of this act, Website owners are restricted from disseminating any form of personal information of children under the age of 13. We display our Pilot's personal information on our Website. As a matter of practice, though, we do **not** permit children under 14 years of age to join us. If we become aware one of our Pilots is under 13 years of age, we will immediately suspend their credentials. We continually work to ensure all user-generated content meets our goal of a family-friendly environment and is suitable for all ages. To meet this standard, we moderate our content, but cannot guarantee consistent compliance.

Cookie Policy Addendum

This *Cookie Policy Addendum* to our *Privacy Policy* has been created to explain:

- how we use cookies and similar technologies; and,
- to demonstrate our firm commitment to the privacy of your personal information.

The first time you visit our Website, we notify you about our use of Cookies through a notification

banner. By continuing to use the Website, you consent to our use of Cookies as described in this *Cookie Policy*. However, you can choose whether or not to continue accepting Cookies at any later time. Information on how to manage Cookies is set out later in this Cookie Policy.

Our use of any personal information we collect about you is subject to the tenants of our Privacy Policy.

What are Cookies?

Cookies are small text files containing user IDs that are automatically placed on your computer or other device by when you visit a Website. The Cookies are stored by the internet browser. The browser sends the Cookies back to the Website on each subsequent visit, allowing the Website to recognize your computer or device. This recognition enables the Website provider to observe your activity on the Website, deliver a personalized, responsive service and improve the Website.

Cookies can be 'Session Cookies' or 'Persistent Cookies'. Session Cookies allow a Website to link a series of your actions during one browser session, for example to remember the items you have added to a shopping basket. Session Cookies expire after a browser session and are therefore not stored on your computer or device afterwards. Persistent Cookies are stored on your computer or device between browser sessions and can be used when you make subsequent visits to the Website, for example to remember your Website preferences, such as language or font size.

Cookies We Use and Their Purpose

We use four (4) types of Cookies – 'Strictly Necessary' Cookies, 'Performance' Cookies, 'Functionality' Cookies and 'Targeting'/'Advertising' Cookies. Each type and the purposes for which we use them are described in this section.

Strictly Necessary Cookies

Strictly Necessary Cookies enable you to move around the Website and use essential features. For example, if you log into the Website, we use a Cookie to keep you logged in and allow you to access restricted areas, without you having to repeatedly enter your login details. If you are registering for or purchasing a product or service, we will use Cookies to remember your information and selections, as you move through the registration or purchase process. *Strictly Necessary* Cookies are necessary for our Website to provide you with a full service. If you disable them, certain essential features of the Website will not be available to you and the performance of the Website will be impeded.

Performance Cookies

Performance Cookies collect information about how you use our Website – for example which pages you visit and if you experience any errors. These Cookies don't collect any information that could identify you – all the information collected is anonymous. We may use these Cookies to help us understand how you use the Website and assess how well the Website performs and how we could improve it for you. We may also use such Cookies to discover which parts of the Website interest you and measure how effective our promotion of features is.

Functionality Cookies

Functionality Cookies enable a Website to provide you with specific services or a customized experience. We may use these Cookies to provide you with services such as watching a video or adding user comments. We may also use such Cookies to remember changes you make to your settings or preferences – for example, changes to text size or your choice of language or region – or offer you time-saving or personalized features. You can control whether or not *Functionality* Cookies are used, but disabling them may mean we're unable to provide you with some services or features of the Website.

Targeting or Advertising Cookies

Targeting or Advertising Cookies enable a Website to show you relevant advertising or facilitate your use of third party services. We may use such Cookies to make it easier for you to 'like' or 'share' Website content through your social network(s). The social networking Websites may subsequently use information about your visit to target advertising to you on those Websites. See their Website terms and policies for further information on such use. You can control whether or not *Targeting or Advertising* Cookies are used, though disabling them may mean we're unable to provide you with some services or features of the Website.

First and Third Party Cookies

The Cookies placed on your computer or device include *First Party* Cookies, meaning Cookies placed there by us, or by third party service providers acting on our behalf. Where such Cookies are being managed by third parties, we only allow the third parties to use the Cookies for our purposes, as described in this Cookie Policy, and not for their own purposes.

The Cookies placed on your computer or device may also include *Third Party* Cookies, meaning Cookies placed there by third parties. These *may* include third party advertisers who may display advertisements on our Website and/or social network providers who provide 'like' or 'share' capabilities (see the above section on *Targeting or Advertising* Cookies). They may also include third parties who provide video content which is embedded on our Website (such as *YouTube*). Please see the Website Terms and Policies of these third parties for further information on their use of Cookies.

To learn about the specific *First Party* and *Third Party* Cookies used by our Website – and manage them – submit a **Help Ticket**.

Managing Cookies

You always have a choice over whether or not to accept Cookies. When you first visit the Website and we notify you about our use of Cookies, you can choose not to consent to such use. If you continue to use the Website, you're consenting to our use of Cookies for the time being. However, you can choose not to continue accepting Cookies at any later time. In this section, we describe ways to manage Cookies, including how to disable them.

You can manage Cookies through the settings of your internet browser. You can choose to block or restrict Cookies from being placed on your computer or device. You can also periodically review the Cookies placed there and disable some or all of them.

You can learn more about how to manage Cookies on this website: **youronlinechoices.com**

*If you choose **not** to accept certain Cookies, it may mean we're unable to provide you with some services or features of the Website.*

Flash Cookies and How to Manage Them

We may provide videos and other content through the Website using *Adobe Flash Player*, which uses *Flash Cookies* – also known as *Local Shared Objects* – to provide useful features such as auto-resume and the ability to save your preferences. Flash Cookies are placed on your computer or device in much the same as other Cookies. However, it's not possible to manage them in the same way through your internet browser settings.

*If you choose **not** to accept Flash Cookies, you may be unable to view certain content, such as videos.*

Changes to Cookie Policy

We may update this Addendum from time to time. The updated version will be indicated by an updated *Version* date at the top of the first page of this document and it'll be effective as soon as it's accessible. If we make any significant material changes, we may notify you either by:

- prominently posting a notice of such changes to our Services; or,
- by directly sending you a notification.

We encourage you to review the *Privacy Policy* and this *Cookies Policy Addendum* frequently to remain informed about how we're using and protecting your information.

Questions or Concerns

If you have any questions or concerns about this Cookie Policy Addendum or our use of Cookies on the Website, submit a **Help Ticket**.

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