

Privacy Policy for the Website and Business Contacts

The companies of the Nayak Group ("Nayak" or "we") take protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the legal data protection regulations, in particular the General Data Protection Regulation (GDPR).

The following companies belong to the Nayak Group: Nayak-LM GmbH, Nayak-LM Germany GmbH, Nayak-LM Austria GmbH, Nayak-LM Balearic S.L., Nayak-LM Belgium BV, Nayak-LM Ireland Ltd., Nayak-LM France SAS, Nayak Aircraft Services Italy S.r.l., Nayak-LM Spain S.L., Nayak JV1 S.L., Nayak JV2 S.L., Nayak Aircraft Service Holding BV, Nayak Aircraft Service Netherlands BV, Nayak Aircraft Service NL GmbH, Nayak-LM Israel Ltd.

The purpose of this privacy policy is to inform you about the processing of your personal data when you

- visit our website (Section 3.1 and 3.2),
- subscribe to our newsletter (Section 3.3),
- visit our social media pages (Section 4), or
- stay in contact with us as part of our business relationship (Sections 3.4 and 5).

Furthermore, this privacy policy provides information on the recipients of personal data within the EEA and third countries (Section 6), the deletion of your personal data (Section 7), your rights as a data subject (Section 9), and any automated decision-making (Section 10).

In case you have applied for a job at the Nayak Group, please refer to our privacy notice for applicants and the use of our career portal which can be found on the registration and login page at [zinrec | access](#).

1. Controller and its Contact Information

Nayak-LM GmbH is the controller for the processing of personal data within the meaning of data protection law:

Frachtstrasse 26
40474 Düsseldorf
Germany
Phone: +49 (0) 211 542465 51
E-mail: info@nayak.aero

Certain personal data may be shared within the Nayak group. Where companies of the Nayak group act as joint controllers when processing your personal data, the address above is the contact point for these processing activities.

2. Contact Details of our Data Protection Officer

If you have any questions about this privacy notice, in particular regarding the exercise of your rights, please contact our data protection officer at DSB-DE@nayak.aero.

3. Use of Our Website

3.1 Visiting the Website

Our webserver automatically collects and stores information which your browser communicates to us automatically and which will be stored in so-called server log files. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

Processing this data is based on legitimate interests according to Art. 6(1)(f) GDPR. We as the operators of the website have an overriding legitimate interest in the technically error free depiction and the optimization of our website. To achieve this, server log files must be recorded.

Server log files will be retained for 14 days.

3.2 Cookies and Similar Technologies

When you visit our website, we may also collect certain information with cookies. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. When you revisit our website, cookie data is once again transmitted to our web server. This allows us, for example, to recognize you and take your individual settings into account when displaying the website. Some cookies are strictly necessary to ensure the technical functionality of the website. The legal basis for the use of technically necessary cookies is our legitimate interest in providing our website in accordance with Art. 6 (1) (f) GDPR. The legal basis for storing these essential cookies on your device is Section 25(2) No. 2 of the German Telecommunications and Digital Services Data Protection Act (TTDDDG). These essential cookies are always active and are labeled as "Essential" in our cookie banner.

Other cookies are used for web analytics and marketing purposes. For these non-essential cookies, we rely on your explicit consent (Art. 6(1)(a) GDPR). Your consent also serves as the legal basis for storing these cookies on your device (Section 25(1) TTDDDG).

We present a cookie banner upon your first visit, explaining our cookie usage. We only set non-essential cookies after you have provided your consent. Until then, only essential cookies are active.

For data transfers to the USA, we primarily use providers certified under the EU-US Data Privacy Framework. If a provider is not certified, we ensure appropriate safeguards, such as Standard Contractual Clauses (SCCs) approved by the EU Commission, are in place. For more details on international data transfers, please see Section 6 of this Privacy Policy.

Your cookie consent applies to data processing by all companies within the Nayak Group. This means that data collected via cookies on this website may be shared among Nayak Group companies.

The Nayak Group companies act as 'joint controllers' (Art. 26 GDPR) for the data collected through cookies described here, as they jointly determine the purposes and means of

processing. You can exercise your data protection rights concerning cookie-related data against any company within the Nayak Group.

You can withdraw your consent at any time by revisiting our cookie banner (accessible via the cookie icon or 'Privacy Settings' on the left bottom corner of your screen) and adjusting your preferences.

You can also manage or disable cookies directly through your browser settings. Additionally, browser plugins like AdBlock, Ghostery, or NoScript can help prevent web analysis; please consult their respective privacy policies.

Many online advertising and web analytics providers are members of industry associations that offer centralized opt-out mechanisms. These allow you to prevent web analytics across multiple providers, including the creation of pseudonymized usage profiles:

- European Interactive Digital Advertising Alliance (EDAA): <http://www.youronlinechoices.com/de/praferenzmanagement/>
- Digital Advertising Alliance (DAA): www.aboutads.info/choices
- Network Advertising Initiative (NAI): <http://optout.networkadvertising.org/?c=1>

Please note that some features of our website may be limited if you choose to disable certain cookies.

For a detailed overview of the specific marketing and web tracking services we use, including their providers and purposes, please refer to our Cookie Banner. This banner appears when you first visit our website and can always be accessed via the cookie icon or the 'Privacy Settings' button on the left bottom corner of your screen.

3.2.1 Cookiebot

To manage your cookie preferences and ensure data protection compliance, we use Cookiebot, a consent management tool provided by Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark.

When you first visit our website, Cookiebot displays a cookie banner. This banner allows you to give or manage your consent for different cookie categories. You can also easily revisit the banner at any time to update your cookie settings.

To record and remember your preferences, Cookiebot collects certain information. This includes:

- Your anonymized IP address
- The date and time you gave consent
- Your browser information
- The specific URL of our page where you granted consent
- A unique, encrypted key
- Your consent status, which serves as a record of your choices

Cookiebot stores your cookie consent preferences for 12 months.

Our legitimate interest in processing this data is to effectively manage user consent for cookies on our website in a legally compliant manner (Art. 6(1)(f) GDPR).

For more details on how Cookiebot processes data, please refer to their privacy policy: <https://www.cookiebot.com/de/privacy-policy/>.

3.2.2 Google Analytics

If you consent to "Analytics Cookies" via our cookie banner, we use Google Analytics, a web analysis service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google Analytics uses cookies to analyze your use of our website. The information generated by the cookie about your use of this website (including your IP address) is typically transmitted to and stored on a Google server in the USA. However, your IP address will be shortened and anonymized by Google within member states of the European Union or other signatory states to the Agreement on the European Economic Area before transmission. Only in exceptional cases will the full IP address be sent to a Google server in the USA and then shortened there.

Google uses this information on our behalf to evaluate your website usage, compile reports on website activity, and provide us with other services related to website and internet usage. The IP address transmitted by your browser for Google Analytics purposes will not be merged with other Google data.

Google LLC is certified under the EU-US Data Privacy Framework, ensuring an adequate level of data protection for transfers to the USA.

You can easily withdraw your consent for analytics cookies at any time by revisiting your privacy settings in our cookie banner (accessible via the cookie icon or "Privacy Settings" in left bottom corner of your screen).

Data collected by Google Analytics in the form of pseudonymized user profiles will be deleted no later than 14 months after the last new entry in the respective user profile.

For more detailed information on Google's data protection practices, please visit their privacy policy: <https://policies.google.com/privacy>.

3.2.3 Google Tag Manager

When you use our services, Google Tag Manager may be employed. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Google Tag Manager is a tool that helps us manage and control various tracking and marketing tags on our website. It simplifies the implementation and oversight of these services, meaning we don't have to directly adjust our website's source code every time.

Contrary to earlier assumptions that Google Tag Manager itself does not process personal data or set cookies, the Hanover Administrative Court (judgment of March 19, 2025, file no. 10 A 5385/22) has clarified that this can indeed be the case. The court ruled that Google Tag Manager, through its function as a "data forwarder" and its ability to process IP addresses and set cookies, itself constitutes a data processing activity relevant under data protection law.

What this means for you: The use of Google Tag Manager, and the associated processing of your data and setting of cookies (for example, for session IDs or the tool's functionality), will only occur with your explicit consent. We obtain this consent via our cookie banner when you first visit our website. Without your consent, Google Tag Manager will not be active.

The legal basis for the processing of your data by Google Tag Manager and the setting of associated cookies is therefore your consent in accordance with Art. 6 (1) lit. a GDPR.

For more information on data processing by Google, please refer to Google's Privacy Policy: <https://policies.google.com/privacy>.

3.3 Newsletter and Marketing Communications

3.3.1 Newsletter Subscription

When you subscribe to our newsletter and the receipt of marketing communication, we use a double opt-in process. After you enter your email address, we will send you a confirmation email containing a link. Your subscription is only complete once you click this link. This process ensures that you have given your explicit consent. After you successfully sign up for our newsletter and marketing communications, the companies of the Nayak Group will use the email address, name, surname and company you give us to send you newsletters and marketing communications. The companies of the Nayak Group are listed at the beginning of this privacy policy.

The legal basis for sharing your data within the Nayak group and sending these communications is your consent in accordance with Art. 6(1)(a) GDPR.

You can withdraw your consent, unsubscribe from the newsletter, and object to receiving marketing emails at any time. An unsubscribe link is provided in every newsletter and promotional email we send you. The unsubscribe link provided in any email you receive from any of our group companies will opt you out from all marketing communications from the entire group.

3.3.2 Marketing for Existing Customers

If you have purchased goods or services from us, we may use the email address you provided to send you marketing communications for our own similar products or services. This will only occur if you have not objected to such use.

The legal basis for this processing is our legitimate interest in direct marketing in accordance with Art. 6(1)(f) GDPR.

You can object to this use of your email address at any time, at no cost beyond the basic transmission rates, by using the unsubscribe link found in every marketing email or by contacting us directly.

3.3.3 Service Provider and Performance Measurement

We use the service Brevo to send and manage our newsletter and marketing communications. The provider of the service Brevo, acting as our data processor, is Sendinblue GmbH, Köpenicker Straße 126, 10179 Berlin, Germany. We have entered into a data processing agreement with Sendinblue GmbH, which obligates them to comply with

data protection regulations. Brevo processes your email address and other data related to the sending and analysis of the emails on our behalf.

Our newsletters contain a "web beacon," which is a pixel-sized file that is retrieved from Brevo's server when you open the email. This allows us to gather technical information (e.g., your browser, IP address, and time of retrieval) and analyze reader engagement. We receive reports from Brevo on open rates and which links are clicked.

We use this data to understand the reading habits of our users and to tailor our content to their interests.

Please note: When you consent to receive our newsletter, your consent also includes this performance measurement. It is not possible to opt out of performance measurement separately from the newsletter. To withdraw your consent for performance measurement, you must unsubscribe from the newsletter entirely. The legal basis for this processing is your consent (Art. 6(1)(a) GDPR). To subscribe to our newsletter, you must first register by providing us with your email address. We will then send you an email to confirm your registration. This email will contain a link that you must click to complete the subscription process. After you successfully subscribe, we will use your email address to send you the newsletter. Additionally, we'll add you to our mailing list to send you email advertisements for our own similar goods or services, provided you've purchased a good or service from us and haven't previously objected to your email address being used for this purpose.

3.4 Map Services

Our services utilize both Google Maps and OpenStreetMap to provide interactive maps, helping you visualize geographical information, find our locations, and get directions.

Google Maps

We use Google Maps, a web service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

When you consent via our cookie banner to use Google Maps, a connection is established between your browser and Google's servers. This interaction is similar to visiting Google's search engine website. Google Maps may also set a cookie on your device.

If you're logged into your Google account while using our services, Google may directly associate the collected data with your account. If you prefer this data not be linked to your Google profile, please log out of Google before enabling the map service. Google is solely responsible for the data processing it performs.

Google LLC is certified under the EU-US Data Privacy Framework, which helps ensure an adequate level of data protection for transfers to the USA.

If you do not agree to the future transmission of your data to Google when using Google Maps, you can completely deactivate the Google Maps web service by disabling JavaScript in your browser. Please note that if you do this, Google Maps and the map display on this website will not be usable.

For more information on Google Maps, please refer to the Google Maps Terms of Service. For details on Google's data privacy practices, please consult Google's Privacy Policy.

OpenStreetMap

We also integrate OpenStreetMap, an open-source mapping service. OpenStreetMap is provided by the OpenStreetMap Foundation, St John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS, United Kingdom.

When you use OpenStreetMap on our site, the map data is loaded from OpenStreetMap's servers. Typically, OpenStreetMap does not collect personal data of users viewing the maps. However, for technical display purposes, your IP address and information about your browser might be transmitted to the OpenStreetMap servers. Since the OpenStreetMap Foundation is based in the UK, data transfers to the UK are permitted under an adequacy decision by the European Commission.

You can find more information about OpenStreetMap's data handling in their Privacy Policy.

3.5 Use of Friendly Captcha

To ensure the security of our website and protect against spam and abuse, we use Friendly Captcha, a service provided by Friendly Captcha GmbH, Am Anger 3-5, 82237 Wörthsee, , Germany.

Friendly Captcha helps us distinguish between human users and automated bots. Unlike some other bot protection services, Friendly Captcha is designed with a strong focus on data privacy. Unlike other bot protection services, it does not use cookies and does not collect or store any personal data from our end-users. The service works by having the user's device solve a cryptographic puzzle, which is a proof-of-work mechanism. This process generates technical data, such as a timestamp and the user agent, which are necessary to verify the solution. These data are processed exclusively on servers located within the European Union (EU) and are neither stored permanently nor used to create personal profiles.

All data processing by Friendly Captcha takes place on servers located within the European Union (EU). This ensures that your data remains within the strict data protection framework of the GDPR.

The use of Friendly Captcha is based on our legitimate interest in securing our online services (Art. 6 (1) lit. f GDPR). We have carefully weighed our interest in protecting our website against potential threats and your fundamental right to data protection. Since Friendly Captcha operates without collecting personal data, we have concluded that our legitimate interest outweighs any potential, minimal impact on your privacy rights.

4 Company Page on LinkedIn

We maintain company page on the social network LinkedIn. As the provider of this page, we are the data controller for the collection (but not for the further processing carried out by LinkedIn) of the visitors' data to our company pages jointly with LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Irland (LinkedIn).

The data collected includes Information about the types of content visitors view or interact with, or the actions they take and Information about the devices visitors use (e.g., IP addresses,

operating system, browser type, language settings, cookie data). LinkedIn also collects and uses information to provide analytics services, known as "page insights". These help us understand how people interact with our LinkedIn page and with content associated with us.

We have entered into an agreement with LinkedIn, the "Page Insights Joint Controller Addendum" which you can find here: <https://legal.linkedin.com/pages-joint-controller-addendum>. The agreement includes rules and obligations about which security measures LinkedIn must implement and stipulates that LinkedIn will fulfill the data subjects' rights (i.e. you can, for example, request your right of access and or right to erasure directly to LinkedIn).

Your data protection rights (such as the right of access, erasure, restriction and right to lodge a complaint to the supervisory authority), are not restricted by the agreement with LinkedIn. You can file your request both to us and to LinkedIn.

The purposes of processing are answering contact requests and communication, tracking (e.g. interest/behavioral profiling, use of cookies), remarketing, audience measurement (e.g. access statistics, recognition of returning visitors).

The legal basis for data processing is our legitimate interest in ensuring that our offer and our company are present on the internet as comprehensively as possible, as well as the possibility of communicating with you via social networks (Art. 6 (1) lit. (f) GDPR).

It is possible that some of the information collected may also be processed outside the European Union in the USA. LinkedIn Corporation is certified under the Data Privacy Framework. For data transfers between the EU and the USA, see the relevant section below.

For further information on how LinkedIn handles personal data, please see LinkedIn's Privacy Policy.

5 Business Contacts and Performance of Contracts

If you contact us for example by email, telephone, post or at trade fairs and other events, we will collect your contact details, including your position in your company if applicable. We store this data in our contract data base and process your data for the purpose of contacting you.

If your request is made in connection with the performance of a contract concluded with you or for the initiation of such a contract, the legal basis for our data processing is Art. 6 (1)(b) GDPR. If you are an employee of an interested party, supplier, service provider or other business partner and we receive your personal data in this context; the legal basis in this case is either Art. 6 (1)(b) GDPR as necessary for the performance of the contract, or our legitimate interest in establishing or carrying out the business relationship with your employer (Art. 6 para. (1) (f) GDPR). This processing may include personal data of your employees, specifically names, business contact details (e.g., business email, business phone number), job title or role within the company, and the company itself. This data is extracted from documents you provide us with for the performance of our contract (e.g., invoices, contracts, proposals) or from publicly available sources (e.g., download of your terms and conditions from your company's website). For internal purposes, we also integrate this data into our query and research tools, including our self-developed AI-powered tools. These tools enable us to create custom copilots and intelligent workflows. These tools primarily utilize advanced artificial intelligence (AI) and natural language processing (NLP) capabilities, leveraging large language models such as those integrated into Microsoft Copilot Studio. Specifically, we utilize models from OpenAI's GPT

series (e.g., GPT-3.5 and GPT-4) accessed via Microsoft Azure OpenAI Service. Through Azure OpenAI Service, your data remains within the secure Microsoft Azure environment and is not used by OpenAI for training purposes, nor is it transmitted to OpenAI directly. These tools automatically analyze and extract relevant information from document content. This includes identifying key terms, clauses, and data points, which significantly facilitates efficient information retrieval and management for our business operations, such as contract management, supplier relations, and lead qualification. The AI's role is to enhance our internal data processing efficiency, allowing us to respond to requests and manage relationships more effectively. This processing is necessary for our legitimate interests in optimizing our business operations, improving customer and supplier relationship management, and ensuring efficient contract administration. We have balanced these interests against the rights and freedoms of the data subjects and concluded that our legitimate interests prevail, given the limited scope of data processed, the security measures in place, and the benefits of improved service delivery and operational efficiency. Otherwise, the legal basis is our legitimate interest in the efficient processing of your request, Art. 6(1)(f) GDPR. Our legitimate interest is to initiate potential business relationships with you, re-establish contact, and/or process your request for further handling.

In the course of normal business operations, situations may arise where providing a notice in accordance with Art. 13 and Art. 14 GDPR is typically not feasible. This primarily includes cases like the spontaneous exchange of business contact information at trade fairs, events, business lunches, or other official activities, such as exchanging business cards or initial contact initiated by us or by you with business content.

In such situations, we regularly collect the following data from you: contact details (like your name, address, email, or phone number), data about your company (like its address, email, business field, job description, title), and data related to your input/inquiry (like content, time of inquiry, means of communication).

This data is processed and stored as part of our business activities to re-establish contact and/or process your request and for further handling.

The processing of your data for these purposes is based on Art. 6 (1) (f) GDPR and is done in our legitimate interest. Our legitimate interest is to initiate potential business relationships with you, re-establish contact, and/or process your request and for further handling.

6 Recipients and Data Transfers to Countries outside the EEA

We disclose personal data to third parties only when it is necessary for providing our services or when we are legally obligated to do so. This includes sharing data with service providers who support us in our business operations. We have appropriate data processing agreements in place with these providers to ensure your data is protected.

We engage these service providers for purposes such as:

- Accounting, financial services, tax, and legal consulting
- IT services and infrastructure, for example, for our application process
- Website, web application, and app hosting
- Use of external cloud services and infrastructure
- IT support and maintenance
- Secure data destruction and facility management

- This list is not exhaustive, and other categories of service providers may be engaged as needed.

You will find detailed information about the service providers we engage for individual processing operations in the relevant sections of this Privacy Policy.

In all other cases, we will only share your personal data with third parties when permitted by law or with your explicit prior consent. For instance, we may share data with other companies within the Nayak group if necessary to fulfill your request.

Where necessary for our purposes, we may transfer your personal data to recipients located outside the European Economic Area (EEA). Such a transfer may be necessary, for example, to perform our contractual obligations to you or if we are required by law to disclose data to authorities in a third country.

We will only send data to third countries if a lawful data transfer mechanism is in place. This ensures that the recipient of the data guarantees an adequate level of data protection or has implemented other appropriate safeguards. Specifically, we rely on the following mechanisms:

- **Adequacy Decisions:** We may transfer data to countries for which the EU Commission has issued an "adequacy decision" under Art. 45 GDPR. This decision confirms that the country provides a level of data protection comparable to that in the EU.
- **Standard Contractual Clauses (SCCs):** In the absence of an adequacy decision, we primarily use the Standard Contractual Clauses issued by the EU Commission. These are contractual commitments that require the data recipient in the third country to protect your data in line with EU standards.

In relevant sections of this Privacy Policy, we specify the data transfer mechanism employed whenever a service provider's engagement involves transmitting data to a third country outside the EEA.

7 Period of Storage

We delete your personal data as soon as its processing is no longer required for the purposes explained in this privacy notice. If legal retention obligations prevent deletion, we restrict the processing of your data to this archiving purpose and delete your data when the retention period expires. Such retention obligations exist under German commercial and tax law, e.g. business letters for six years to the end of the year and for accounting-related documents for eight years to the end of the year.

8 Data Security

We use state-of-the-art technical and organizational data security measures to protect your data from manipulation, loss and unauthorized access. When you use our career portal, your data is transmitted in encrypted form to prevent misuse by third parties. SSL encryption is used for this purpose.

9 Your Rights as a Data Subject

Data protection law grants you a number of rights with regard to data relating to your person (so-called data subject rights). In general, these are

- the right to access personal data we have stored about you (Art. 15 GDPR),
- the right to rectify inaccurate data (Art. 16 GDPR),
- the right to delete data that may no longer be stored (Art. 17 GDPR),
- the right to restrict the processing in certain cases (Art. 18 GDPR),
- the right to data portability, i.e. to transfer data they have provided in electronic form to you or to a third party (Art. 20 GDPR), and
- the right to revoke consent given, if applicable, with effect for the future (Art. 7 (3) GDPR). Please note that in the event of a revocation, we will continue to retain your consent. This is because even after revocation and deletion of your personal data, we must be able to prove consent. The legal basis for the (also continued) storage of consent is Art. 6 (1) (c) in conjunction with Art. 5 (1) (a), (2), Art. 7 (1) GDPR and Art. 6 (1) (f) GDPR.

Furthermore, you can object to processing if it is based on legitimate interests (Art. 6 (1) (f) GDPR) or Art. 6 (1) (e) GDPR (Art. 21 (1) GDPR), for which you must provide a specific reason.

If and to what extent these rights exist in the individual case and which conditions apply is determined by law, i.e. by the GDPR and applicable local data protection laws. You also have the right to lodge a complaint to a data protection authority. If you have any questions or complaints about data protection at Nayak, we recommend, in the first instance, that you contact our data protection officer (see Section 1).

10 No automated decision making

We do not use your personal data for automated individual decision making.

11 Changes to the Privacy Policy

New legal requirements, business decisions or technical developments may require changes to our privacy policy. The privacy notice will then be adapted accordingly.

Status: August 2025