

# Privacy Policy

Your privacy is important to us. AssetWorks is committed to protecting your privacy and maintaining the integrity of any identifiable information ("Personal Information") we collect about you. The purpose of this Privacy Policy is to outline the steps we take to keep your Personal Information confidential, to inform you about how and why we collect Personal Information and to provide you with our contact information in case you have any questions or concerns arising out of our Privacy Policy.

Protecting your privacy and maintaining the integrity of Personal Information means that: we will keep your information and the business you do with us in confidence; we will not sell, rent or loan your information to third parties; we will respect your privacy when we may contact you concerning various products and services which we make available to you from time to time; you will have control over how we obtain, use and under circumstances give out information about you; and you will have access to the information that we have about you.

## Why AssetWorks May Collect Personal Information

AssetWorks collects Personal Information and uses it in order to:

- Establish identity;
- Perform necessary identity and security verifications;
- Process transactions and conduct business;
- Deliver products and services;
- Provide customer support and services;
- Provide ongoing service delivery;
- Provide you with information;
- Improve products, services and service delivery;
- Better understand your needs, interests and suitability for various products and services;
- Recommend specific products and services that may meet your needs;
- Respond to issues, questions, and queries;
- Protect you and us against errors or fraud; and
- Co-operate with law enforcement and legal authorities, where required, to comply with applicable laws and with court orders.

AssetWorks will collect, use and may disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances; and endeavors to collect as little information as possible as may be necessary under the circumstances.

Please note that aggregated statistics and information, where the identity of a specific individual cannot be identified, is not Personal Information. AssetWorks reserves the right to use aggregated information in any manner it determines, in its discretion, to be appropriate. Use of such aggregated information may include, but not be limited to, the preparation of aggregated

user statistics and information summaries to improve efficiencies, more effectively describe our product and service offerings, and assist in the marketing of our products and services. Aggregated statistics and information will not contain Personal Information.

### **What Type of Personal Information AssetWorks May Collect**

AssetWorks collects various types of Personal Information. During the course of doing business or interacting with AssetWorks, or receiving products and services from or through AssetWorks, you may depending on the nature of the circumstances be asked to provide AssetWorks with:

- Geographic (physical) addresses;
- Demographic information;
- E-mail addresses;
- Phone numbers or other contact information;
- Names (first, and last or whatever the family identifying name is);
- Shipping information;
- Billing information;
- Transaction history;
- Web site usage preferences;
- Feedback regarding our business, services, web site and public relations;
- Source IP addresses;
- Times and dates of access to Web site servers;
- Language;
- Personal preferences;
- Product and service preferences;
- Browsers types and configurations; and
- Miscellaneous administrative and computer traffic information.

Certain forms of information, such as government issued or private sector issued licenses, permits, certificates, cards, in the nature of driver's licenses, social insurance/security number, passports, insurance cards, voucher numbers, and the like, although convenient for identification, is voluntary. It is up to you whether you want to provide this, or other suitable identification, subject to any legal requirements.

### **How Does AssetWorks Collect Personal Information**

AssetWorks will only collect Personal Information that you have voluntarily provided to us or have agreed to have provided to us. AssetWorks will not collect any Personal Information about you without advising you accordingly (either by way of this Privacy Policy or by way of providing you with some other form of notice at the time we are requesting or collecting Personal Information), why and how that Personal Information is being collected and how such Personal Information will be used or disclosed. AssetWorks may collect Personal Information through a variety of means:

- using our website;
- using our services;
- in the course of communications with us (face-to-face, by e-mail, by phone, mail or otherwise);
- in the course of feedback to us regarding our business, services, website and public relations;
- when registering with us for services or, where relevant, accounts, or, where relevant, for the download of our software;
- customer, membership, recipient, or service lists that have been lawfully acquired from third parties;
- through the completion of manual or electronic forms;
- website cookies – Cookies are identifiers that can be sent from a website via your browser to be placed on your computer's hard drive. You may elect not to accept cookies by changing the designated settings on your web browser; however, not utilizing cookies may prevent you from using certain functions and features of web site. Information collected from the use of cookies is used to improve AssetWorks services;
- web beacons – Web beacons are small, graphic images that allows a website operator to collect certain information and monitor user activity on its website. A web beacon is a very small pixel which is invisible to the user. AssetWorks uses web beacons to collect information that is not of a personal nature;
- clickstreaming - Clickstreaming is a technology that allows a website operator to track the paths that surfers take as they access a website and look at the site's pages, and as they use links to other sites. AssetWorks collects such information from visitors to [www.assetworks.com](http://www.assetworks.com); and
- website traffic information, which is monitored and analyzed in order to determine which products, services or features may be of interest to visitors, so we may improve our website, products, services, features or other offerings.

In addition, we may review and analyze your use of products and services, to help us serve you better, and to bring other products and services to your attention, which we feel, will be of benefit to you. We also collect and analyze information from other sources for the same purposes.

### **How AssetWorks May Disclose Personal Information**

AssetWorks does not sell any Personal Information it collects to third parties. AssetWorks may share Personal Information with its affiliates, subsidiaries, employees, contractors and agents in the course of providing you with our business services, support, or the fulfillment or delivery of our products or services.

AssetWorks may disclose Personal information if we are required to do so a court of competent jurisdiction, other legal or regulatory authority, or, if there is a good faith belief, and reliance on said belief that disclosure is necessary to: comply with any legal process served on AssetWorks; maintain, uphold or protect AssetWorks' rights or property; protect and ensure the personal

safety of the public or other AssetWorks clients; or protect against criminal or quasi-criminal activities, or to detect, prevent, investigate allegations of, or address, misrepresentation or fraud.

AssetWorks reserves the right that in the event of a bankruptcy filing, mergers with third parties, acquisition by third parties, sale of assets (all or partial), or any other transfer of all or substantially all of AssetWorks relevant assets to a third party, that AssetWorks shall be entitled share (or sell as an ancillary aspect of the overarching business transaction) the Personal Information you have provided to us to the third party.

## **Retention and Disposal**

We keep information only for so long as it is needed for the efficient and effective delivery or fulfillment of the software, products, or services you are using or contemplating using and for a reasonable time thereafter, or to meet any legal requirements. We will either destroy or remove information when it is no longer needed.

## **Security and Storage**

AssetWorks endeavors to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information. AssetWorks keeps the Personal Information we collect from about you strictly confidential. Only authorized personnel have access to this Personal Information. AssetWorks personnel who have access to Personal Information receive training regarding privacy protection.

If any employee, contractor or agent of AssetWorks misuses Personal Information, this will be considered as a serious offense for which disciplinary action may be taken, up to and including termination of employment or contract for service. If any individual or organization misuses Personal Information - provided for the purpose of providing services to or for AssetWorks, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between AssetWorks and that individual or organization and possible legal action against such individual or organization.

Our computer security specialists build security by design by default into our computer systems. The aim is to protect your information at all times, when it is stored in data files or handled by our employees. Our systems are also designed to protect your information when it is transmitted, for example, between our data processing centers, our stores and corporate offices. Personal Information may be stored or processed in any jurisdiction in which we or our affiliates, suppliers, subsidiaries or agents maintain facilities. By supplying us with Personal Information you consent to any transfer of this information to other jurisdictions (including countries which have not been assessed for adequacy of privacy laws).

AssetWorks is and shall continue to use industry-standard technology to maintain the security of your personal information, and for our connections to the internet; however, AssetWorks cannot and does not guarantee the privacy, security, authenticity or non-corruption of any information transmitted through the internet or any for information stored in any third-party system connected to the internet.

While AssetWorks takes steps to verify that any service providers, suppliers or the like with whom we share information are committed to maintaining the privacy of Personal Information at standards that are at least as stringent as our own Privacy Policy and has communicated to them to refrain from making any independent or unauthorized use of any Personal Information, AssetWorks does not and cannot guarantee the actions, conduct or standards of any such parties.

AssetWorks shall not be responsible for any claims, damages, costs or losses whatsoever arising out of or in any way related to third-party connections to or use of the Internet. AssetWorks cannot and does not ensure the protection of any Personal Information that you provide to a third-party web site that may reference, be referenced or link to our website. Personal Information collected by these third parties is not subject to, or governed by, this Privacy Policy. AssetWorks shall not be responsible for events beyond our direct control. AssetWorks will not be liable for any direct, indirect, incidental, consequential or punitive damages relating to the uses or releases of Personal Information.

## **Contact**

We are committed to upholding our Privacy Policy. We have policies and procedures in place to educate and assist our employees and contractors in fulfilling their obligations under our Privacy Policy. Our policies and procedures will be reviewed on a regular basis and their results of such review will be presented to AssetWorks' personnel responsible for overseeing privacy matters.

AssetWorks is committed to treating you with the greatest respect and consideration. Please let us know if you have any questions or concerns and we will take steps to address them. If you have any questions regarding this Privacy Policy, would like to confirm the accuracy of your personal information, believe that the privacy of your personal information has not been respected, or would like to update or delete incorrect personal information, please contact AssetWorks by emailing us at: [trey.drake@assetworks.com](mailto:trey.drake@assetworks.com) or write to us the attention of Privacy Policy Manager, AssetWorks, 1777 NE Loop 410, Suite 1250, San Antonio, TX 78217. The Privacy Policy Manager will acknowledge your query and will respond within thirty business days. If we need to extend timing for response, or have to refuse your request, we will advise you accordingly, subject to any legal restrictions.

## **Age**

AssetWorks is committed to protecting the safety of children. AssetWorks will not knowingly request or use Personal Information from children under the age of thirteen without parental consent. If AssetWorks receives actual knowledge does not knowingly or intentionally collect

any Personal Information from children under the age of thirteen, AssetWorks will take steps to have such information eliminated. This website is not to be used by anyone under the age of eighteen. Persons under the age of eighteen are not authorized to use this website and are directed to immediately discontinue use of this website.

## **Updates**

AssetWorks may from time to time update this Privacy Policy, with the updated policy to be posted on the AssetWorks website. The use of Personal Information provided to AssetWorks prior to the update will continue to be governed by the policy in effect at the time the information was provided. We recommend that you revisit this Privacy Policy from time to time on a regular basis.

## **Consent**

By using this website, you agree, and do hereby consent, to our collection and use of information and Personal Information for purposes for which the information/Personal Information was collected and in accordance with this Privacy Policy. If you do not consent, you are to immediately discontinue use this website and to refrain from further using this website.

## **Governing Law and Venue**

By visiting and using this website, you acknowledge and agree that the laws of the State of Delaware shall govern, construe, and apply to this Privacy Policy (without any reference or regards to any principles of conflict of laws). The venue for the resolution of any question, dispute, proceeding or other matter arising out of this Privacy Policy shall be the federal or state courts located in the State of Delaware.

AssetWorks will disclose personal information without your permission when required by law, or in good faith belief that such action is necessary to investigate or protect against harmful activities to our company, associates, or property (including this site), or to others.

## Information Security Policy

### Top Level Information Security Policy for Volaris Group

#### Purpose and Applicability

The purpose of the Information Security Policy (“Policy”), which forms the basis for securing the information technology environment of the Volaris Group of companies, is to outline an overall management framework and guiding principles for information security. These principles, as set out in this Policy are only a minimum baseline for Volaris Group and its affiliated business units or group companies. Affiliated businesses are responsible for achieving compliance with this policy.

#### Scope

This Information Security Policy applies to the business processes and data, information systems and components, employees, and physical areas of Volaris Group and its affiliates.

This Policy will act as a minimum baseline policy for all businesses within the Volaris group. Where there is a conflict between this Policy and any Information Security or related policy of any of Volaris’ affiliated companies, this Policy shall take precedence.

Additional statutes or regulations may apply. The ISO standard for information security management will be used as a guideline to identify risk. It is recognized that statements of applicability would need to be ascertained before any business could be truly measured against the standard in its truest form.

#### Goal

It is our goal not to completely eliminate information security risks, but to minimize them in the most cost-effective manner, offsetting the cost of controls against the anticipated reduction in losses due to security breaches.

High level objectives are as follows:

- \* Confidentiality of information is maintained and upheld
- \* Data Integrity is protected from unauthorized modification
- \* Information and systems are Available to authorized users as required
- \* Regulatory and legislative requirements are met
- \* Data is protected against unauthorized access, internally as well as externally

- \* Information is not disclosed to unauthorized persons through deliberate or careless actions
- \* Business continuity plans are produced, maintained and tested as far as practically possible
- \* Information security training is given to all employees.
- \* Breaches of information security and suspected weaknesses are reported and investigated

### Information security principles

Information security practice within the Volaris Group is guided by the following fundamental principles:

- \* Our information security management system is derived from ISO standards and best practices, such as ISO27001:2013.

- \* Information security controls are necessary to protect the Volaris group and its affiliated companies' information assets against information security risks, including risks to

- o Confidentiality (e.g. preventing unauthorized disclosure of sensitive corporate or personal information),

- o Integrity (e.g. ensuring that human errors and programming bugs do not reduce the completeness or accuracy of our data) and,

- o Availability (e.g. minimizing unplanned system downtime and consequent interruption of critical business processes).

- \* The Information Security function, led by the Volaris Director Data Security, is responsible for the Volaris Information Security documentation comprising supplementary policies, standards, procedures and guidelines for information security.

- \* Businesses are to invest wisely in proven information security controls where justified on the basis of lifecycle cost/benefit assessment and risk analysis.

- \* Information security is pervasive throughout the entire organization in order to protect all our information assets (including those we own and those placed in our care). It is an inherent part of our IT architecture and a component of our operational and management processes. In short, we are all responsible for information security.

- \* Information security is a core element of corporate governance. It is closely related to aspects such as IT management, physical site security, risk management, legal and

regulatory compliance and business continuity. It supports various obligations to our employees, business partners and the community at large.

Monitoring and reviewing The Volaris Director, Data Security will measure and review the effectiveness of our information security efforts.

Supporting data security policies, standards, procedures and guidelines can be found within the forms & policies community on our Volaris intranet.