Global Eagle Entertainment Inc. Website Privacy Policy

(for Global Eagle Entertainment Websites)

EFFECTIVE DATE: May 25, 2018

This Privacy Policy describes how Global Eagle Entertainment Inc., with registered business address at 6100 CENTER DR., SUITE 1050, LOS ANGELES, CA 90045 and email address at customercare@globaleagle.com (“Global Eagle”, “us”, or “we”) collects, uses, and discloses information when users visit the Global Eagle websites that link to this Privacy Policy. Global Eagle is the data controller in respect of your Personal Data (as defined below). If you have any questions or concerns regarding this privacy policy, please contact Global Eagle’s Head of Compliance and Privacy at: WebsitePrivacyPolicy@globaleagle.com

Information regarding the privacy practices of Global Eagle and its subsidiaries and affiliates for direct-to-consumer Global Eagle connectivity or entertainment services is provided when consumers engage directly with those products and services.

Information regarding the privacy practices of Global Eagle and its subsidiaries and affiliates for the Personal Data of job candidates is provided when users submit such job application.

By using our websites, you agree to the terms of this Privacy Policy.

(1) WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

Personal Data You Provide

When you use our websites, you may choose to provide information that could reasonably be used to contact you, or to identify you directly or indirectly, or that otherwise relates to your person, such as your
name, mailing address, telephone number, email address, and communication preferences (collectively, “Personal Data”). We collect the Personal Data you provide when you subscribe to our notifications and/or newsletters, request information, submit comments, or otherwise communicate and interact with us.

Automatically Collected Personal Data

When you use our websites, Global Eagle and/or our service providers, use a variety of tools and technologies that automatically collect Personal Data about how visitors use our websites (“Usage Information”). Usage Information includes browser type and version, operating system, type of device used, IP address, MAC address or other unique identifier for the device used to access the websites, geographical location, the time, referral source, length of visit, page views, and website navigation. This data provides us with information about the use of our websites, such as how many visitors visit a specific page, how long they stay on that page, and which hyperlinks, if any, they “click” on. Usage Information that may be associated with you will be treated as Personal Data.

The technologies we use to automatically collect information may include, without limitation, cookies, web beacons, and other tracking technologies.

For information about our use of cookies and similar technologies, please see our Cookie Policy at http://www.globaleagle.com/about/cookie-policy

(2) HOW WE USE THE PERSONAL DATA WE COLLECT

We use and store Personal Data we collect about and from you on the following legal basis, and for the purposes identified below.

a) We will process your Personal Data on our legitimate interest, for the following purposes:

• to respond to requests that you make;

• to manage our websites;
• to protect the security or integrity of our websites, where necessary;
• to improve the features, performance, and support of our websites; provide third parties with anonymous statistical information about our users (this information will not be used to identify directly or indirectly any individual user);
• to disclose it to third companies as part of due diligence processes within business transfers; and
• as elaborated upon below, to disclose it to our business partners, suppliers or subcontractors which process Personal Data on our behalf for any of the purposes set out in this Privacy Policy.

Where Global Eagle processes Personal Data to meet its legitimate interests, it balances these against data subjects' fundamental rights and freedoms and puts in place robust safeguards to ensure that their privacy is protected.

b) We will process your Personal Data for the following purposes, provided you have given us your prior consent:
• to send you electronic newsletters or promotional emails (in jurisdictions where such consent is required); or
• for any other purpose specifically disclosed to you at the time you provide your Personal Data, provided you have given us your prior consent to that particular processing.

You may withdraw your consent at any time; however, such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

c) We will also process your Personal Data to comply with our legal obligations:
• we may disclose your Personal Data and other information to governmental authorities, if required by applicable laws or by law enforcement officers acting under the color of applicable law.
(3) HOW WE SHARE PERSONAL DATA

Unless you ask or authorize us to do so, or as otherwise stated in this Privacy Policy, we do not trade, rent, or share your Personal Data collected from this website with non-affiliated third parties. We may share non-Personal Data, such as aggregate user statistics, demographic information, and Usage Information (to the extent it is not Personal Data) with third parties for any purpose.

We may disclose information about you to our business partners, suppliers or subcontractors (who process data on behalf of Global Eagle and not for their own purposes) for the purposes set out in this Privacy Policy. The categories of third parties with whom we share your Personal Data are:

Third Parties Providing Services On Our Behalf

In order to carry out your requests, respond to your inquiries, and make various features, services, and materials available to you through our websites, we share your Personal Data or Usage Information with third parties that perform functions on our behalf, such as (a) companies or individuals that: host or operate our websites; analyze data; provide customer service; or manage payments; and (b) sponsors or other third parties that participate in or administer our promotions, surveys, and offers or provide marketing or promotional assistance. In such cases, these third parties are not entitled to use this information for any other purpose.

Business Transfers

If Global Eagle or our assets are acquired by another company, your Personal Data, and any other information that we have collected about the users of our websites, may be disclosed to that company as part of the due diligence process and transferred to that company as part of the transferred assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use Personal Data you have provided in a manner that is consistent with this Privacy Policy. Also, if any bankruptcy or
reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Compliance With Law

We may disclose your Personal Data and other information to third parties, including governmental authorities, if required by applicable law or by law enforcement officers acting under the color of applicable law, or if we believe in good faith that such disclosure is necessary to: (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) protect or defend the rights, property, or safety of Global Eagle, you, other users, or third parties (especially in emergency situations).

(4) YOUR RIGHTS TO MANAGE YOUR PERSONAL DATA AND DATA RETENTION

We offer you choices regarding the collection, use, and sharing of your Personal Data.

You may have the right under applicable law, to verify or access your Personal Data; correct or update your Personal Data when inaccurate or incomplete; ask for its erasure when such Personal Data is no longer necessary for the purposes for which it was collected; restrict the processing of your Personal Data under certain circumstances (in which case we will only retain your Personal Data for the exercise and/or defense of our rights); object to any particular processing operation or activity, having regard to the given circumstances and for reasons related to that particular situation (in which case we will only retain your Personal Data for imperative legitimate reasons or the exercise and/or defense of our rights); or request the portability of any of the Personal Data provided to us (which will allow you to obtain and reuse your Personal Data for your own purposes across different services without hindrance to usability). You may do so by contacting us at the contact information provided below. Please note that unless you state otherwise, we may send any corrected or updated Personal Data to every organization to which your Personal Data has been disclosed in accordance with this Privacy Policy. You also have the right to lodge a complaint with your local data protection authority.
In accordance with our routine record keeping, we may delete certain records that contain Personal Data you have submitted through our websites. Please note that we may be required (by applicable law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). We will keep your Personal Data for as long as we reasonably require to manage your use of our websites and those processes actively requested by you (e.g. providing you with any information you may request at any given time) through our website, and also to comply with any legal retention requirements.

(5) INTERNATIONAL DATA TRANSFERS

Personal Data that we collect may be stored and processed in and transferred between any of the countries in which we operate (Argentina, Brazil, Canada, China, France, Germany, India, Iraq, Kenya, Malaysia, Netherlands, New Zealand, Norway, Russia, Singapore, South Africa, Spain, Sweden, United Arab Emirates, United Kingdom, and United States of America), in order to enable us to use the information in accordance with this Privacy Policy. Some of these countries may not be recognized as affording an adequate level of data protection by your local data protection authority. To comply with privacy laws in the European Union and other jurisdictions, Global Eagle has implemented safeguards in the form of model contracts containing the Standard Contractual Clauses approved by the European Commission that govern our transfer of Personal Data to non-adequate third countries. The conditions of transfer within Global Eagle are defined in an intra-company data transfer agreement that incorporates the Standard Contractual Clauses. For more information on international data transfers, you should contact us at the contact information provided below.

(6) SECURITY OF YOUR PERSONAL INFORMATION

We take reasonable technical, procedural and organizational precautions to prevent the loss, misuse, or alteration of your Personal Data. Of course, no information security system can be 100% secure. While Global Eagle takes steps to protect the security of your Personal Data, please be aware that we cannot
ensure or warrant the security of any Personal Data you transmit to us, and you use this website and provide us with your Personal Data at your own risk.

(7) THIRD-PARTY WEBSITES

Our websites may contain links to other websites. Our provision of these links is for your convenience and does not signify our endorsement of such other websites. We have no control over, do not review, and cannot be responsible for these outside websites or their content.

These other websites may have their own privacy policies. Please be aware that the terms of our Privacy Policy do not apply to these outside websites. We are not responsible for the privacy policies or practices of third-party websites.

(8) CHILDREN

We do not intentionally gather Personal Data about children who are under the age of 18. If you become aware that your child or any child under your care has provided us with Personal Data without your consent, please contact us at the contact information listed below.

(9) CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be updated from time to time and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy. However, if we make any revisions that materially change the ways in which we use or share the Personal Data we have about you, we will provide notice before the change goes into effect and obtain your consent to any such changes as may be required by law.

(10) HOW TO CONTACT US
If you have any questions about this Privacy Policy or our processing of your Personal Data, please write to us by email at WebsitePrivacyPolicy@globaleagle.com or Contact Dmitry Chausovsky, Head of Compliance and Privacy, Global Eagle Entertainment, 6100 Center Dr., Suite 1050, Los Angeles, CA 90045