



## AIRVOLUTION® PRIVACY NOTICE

**Last modified:** September 27, 2023

AAR CORP. and its subsidiaries and affiliates (“AAR,” “we,” “us,” or “our”) are a leading independent provider of aviation services to commercial and government customers around the globe. We respect your privacy and are committed to protecting your personal data.

This Privacy Notice describes the types of personal information we may collect from you when you visit or use our websites and our practices for using, protecting, and disclosing that information.

We may also provide you with additional privacy notices about specific processing activities or offer you additional choices about how AAR processes your personal information as you interact with us through our websites. By providing your personal information to us and / or continuing to use any of our services or visiting our websites, you accept and consent to our privacy practices.

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### **Information we collect about you and how we collect it**

AAR may collect personal information from you when you use or interact with our websites. We collect information that you provide to us, and we collect some information automatically when you use our website. The type of personal information we collect depends on how you interact with us, our services, and the requirements of applicable law. We may collect the following categories of personal information from you when you use our websites:

- **Identifiers:** You may submit your name, company name, title, address, email, or phone number.
- **Other data:** If you apply to one of our posted job openings or opportunities, you may be submitting information on your gender, race, veteran status, disability status, and citizenship.
- **Professional data:** If you apply to one of our job openings or opportunities, you may be submitting personal information such as your resume, education history, employment status, employment history, work authorization, and other personal information submitted by job applicants.
- **Technical information:** We may have access to the Internet Protocol (IP) address, MAC Address or another unique identifier for the device you use to access our websites, also browser type, operating system, device identifying information, approximate location, and the domain name from which you accessed our website.

#### **AAR World Headquarters**

1100 N. Wood Dale Rd., Wood Dale, Illinois 60191 | T +1.630.227.2000 | E [airvolutionsupport@aarcorp.com](mailto:airvolutionsupport@aarcorp.com)

- **Browsing behavior:** We may have access to the date and time you visited our website, specific web pages visited during your connection, the amount of time spent viewing our website, the number of times you return to our website, and other clickstream data.

We may use cookies and web beacons to capture data.

**Cookies** - We may analyze how visitors use our websites through cookie technology. A cookie is a small text file that is placed on your computer when you access our websites, and it allows us to recognize you each time you visit our websites. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them). We may use cookies to:

- monitor website usage;
- manage the website; and
- improve the website and our services

If you choose, you can set your browser to reject cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features that are currently on our websites, or that we may put on our website in the future. Note that browser management tools for cookies are outside of our control and we cannot guarantee their effectiveness.

**Web beacons** - Web beacons include the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the data in cookies set by third parties.

## How we use your personal information

We may use personal information held about you for the following purposes:

- For the purposes for which you provided it.
- To fulfill your requests for our services.
- To respond to your inquiries.
- To carry out our obligations arising from any contracts entered into between our clients and us and to provide you with the information, products, and services that are requested from us.
- To create your account and enable you to use our services.
- To verify your identity.
- To operate, improve and optimize our websites, our businesses, and our services.
- To review usage and operations on our websites.
- To address problems with our websites, our businesses, or our services.
- To protect the security or integrity of our websites and our businesses.
- To monitor the websites for compliance with our [Terms and Conditions](#) and the law.
- To notify you of new services, updates, newsletters, and other informational and promotional materials from us.
- To comply with our legal obligations, resolve any disputes we may have with you or others, and to enforce our agreements with third parties.
- To conduct research.
- To assist with training and quality assurance.
- For prospective employees, to process and respond to your job application.

## Disclosure of your personal information

**AAR does not sell your personal information to any third parties.** To provide the services we offer, we may share personal information with our affiliates and service providers who perform services on our behalf based on our instructions.

We may share aggregate, non-personally identifiable information about visitors to our websites with third parties.

We may share your personal information with third parties if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process, or enforceable governmental request;
- respond to legal process (such as a search warrant, subpoena, or court order)
- enforce our [Terms and Conditions](#), including investigation of potential violations;
- detect, prevent, or otherwise address fraud, security, or technical issues; or
- protect against harm to the rights, property, or safety of AAR, third parties, our customers, or the public as required or permitted by law.

We may share your personal information with a successor organization if AAR undergoes a business transition like a merger, acquisition by another company, or sale of all or part of AAR's assets.

### **Your privacy choices and rights**

Privacy rights over personal information are determined by applicable law, and you have choices over some of the ways we may use and disclose your personal information.

**Consent** - If you consented to our use of your personal information, you may revoke your consent at any time by notifying us. See the [Contact information](#) section at the end for how to reach us if you wish to withdraw your consent.

**Emails** - If you receive unwanted emails from us, you may opt out of future emails by using the unsubscribe link at the bottom of the email. You cannot opt-out of transaction-related emails regarding products or services that you use.

**Cookies** - You may stop or restrict the placement of cookies on your device or remove them through your browser or device.

**Accessing and correcting your personal information.** You may have the right to know about the personal information we hold about you. You may be able to access or request a copy of the personal information we hold or process about you. You also have the right to correct inaccurate personal information we hold about you. See the [Additional state privacy rights](#) and the [Additional international privacy rights](#) sections below to see if your state or country provides you with these additional rights. See the [Contact information](#) section at the end for how to reach us.

### **Additional U.S. state privacy rights**

Various U.S. state laws provide their residents with additional rights over their personal information.

**Colorado, Connecticut, Virginia, and Utah** each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

**Colorado, Connecticut, and Virginia** also provide their state residents with rights to:

- Correct inaccuracies in their personal information, considering the information's nature and processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights, please see the [Contact information](#) section for details on how to reach us.

**Nevada** provides its residents with a limited right to opt-out of certain personal information sales. ***AAR does not sell data triggering that statute's opt-out requirements.***

**California** - The California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”) gives consumers who reside in California more control over the personal information that businesses collect about them.

California provides its residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, considering the information’s nature and processing purpose.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

AAR may collect your personal information and sensitive personal information as listed in the table below. We collect information you provide to us through our websites, and we collect certain data when you use our websites (see [Information we collect about you and how we collect it](#)).

AAR does not “sell” your personal information as it is defined by the CCPA. We also do not share it with third parties for cross-context behavioral advertising. AAR may share your personal information with its affiliates and with third parties providing services to AAR. For example, personal information may be shared with the following categories of service providers to process data for AAR: payroll, tax, compliance, and benefit administration; external recruiters; consultants; identity verification and background check providers.

For each category of personal information collected, AAR expects to retain your personal information for as long as reasonably necessary for the purpose it was collected and for as long as required by law, for a legitimate business purpose, or for AAR’s legal interest.

Personal information category	Business purpose	Sold or shared for cross-context behavioral advertising
Identifiers, such as your full name, title, employer’s name, contact information, gender, date of birth, signature, SSN, driver’s license or state identification numbers	<ul style="list-style-type: none"> <li>• For the purposes for which you provided it.</li> <li>• To fulfill your requests for our services.</li> <li>• To respond to your inquiries.</li> <li>• To carry out our obligations arising from any contracts between our clients and us and to provide you with the information, products, and services that are requested from us.</li> <li>• To create your account and enable you to use our services.</li> <li>• To verify your identity.</li> <li>• Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks.</li> <li>• Conduct employee onboarding.</li> <li>• Maintain and administer payroll and employee benefit plans, including enrollment and claims handling.</li> <li>• Maintain personnel records and comply with record retention requirements.</li> <li>• Provide employees with human resources management services and employee data maintenance and support services.</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data.</li> <li>• Ensure employee productivity and adherence to Company policies.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Firm policy.</li> <li>• Respond to law enforcement requests and as required by applicable law or court order.</li> <li>• Exercise or defend the legal rights of AAR and its employees, affiliates, customers, contractors, and agents.</li> </ul>	No

<p>California Customer Records Personal Information, such as your name, signature, social security number, physical characteristics or description, photograph, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information.</p>	<ul style="list-style-type: none"> <li>• For the purposes for which you provided it.</li> <li>• To fulfill your requests for our services.</li> <li>• To respond to your inquiries.</li> <li>• To carry out our obligations arising from any contracts between our clients and us and to provide you with the information, products, and services that are requested from us.</li> <li>• To create your account and enable you to use our services.</li> <li>• To verify your identity.</li> <li>• To operate, improve and optimize our website, our business, and our services.</li> <li>• Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks.</li> <li>• Conduct employee onboarding.</li> <li>• Maintain and administer payroll and employee benefit plans, including enrollment and claims handling.</li> <li>• Maintain personnel records and comply with record retention requirements.</li> <li>• Provide employees with human resources management services and employee data maintenance and support services.</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data.</li> <li>• Ensure employee productivity and adherence to Company policies.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Firm policy.</li> <li>• Respond to law enforcement requests and as required by applicable law or court order.</li> <li>• Exercise or defend the legal rights of AAR and its employees, affiliates, customers, contractors, and agents.</li> <li>• To process payments to employees and independent contractors; vendors; service providers; customers.</li> <li>• To process payments received from vendors, service providers, or customers.</li> </ul>	<p>No</p>
<p>Protected classification characteristics under CA or federal law, such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), reproductive health decision making, military and veteran status, or genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws.</li> <li>• Design, implement, and promote the Company's diversity and inclusion programs.</li> <li>• Perform workforce analytics, data analytics, and benchmarking.</li> <li>• Conduct internal audits, grievances, and suspected violations of Company policy.</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>• Exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and agents.</li> </ul>	<p>No</p>
<p>Commercial information</p>	<ul style="list-style-type: none"> <li>• Respond to law enforcement requests and as required by applicable law or court order.</li> <li>• To improve our services.</li> <li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data.</li> </ul>	<p>No</p>

<p>Biometric Information, such as facial recognition, fingerprints, keystroke, or other physical patterns, and certain wellness metrics.</p>	<ul style="list-style-type: none"> <li>• Fingerprinting for a criminal background check after an initial offer of employment is made. Criminal background checks protect the company, mitigate risk, and avoid potential negligent hiring lawsuits.</li> <li>• To administer and design health wellness programs.</li> <li>• Exercise or defend the legal rights of the Company and its employees, customers, contractors, and agents.</li> <li>• Prevent unauthorized access to or use of the Company property, including physical structures, information systems, electronic devices, network, and data.</li> </ul>	<p>No</p>
<p>Internet or similar network activity, including all activity on the Company's information systems (such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices).</p>	<ul style="list-style-type: none"> <li>• Facilitate the efficient and secure use of Company information systems.</li> <li>• Improve services and information provided.</li> <li>• Ensure compliance with Company information systems policies and procedures.</li> <li>• Comply with applicable state and federal laws.</li> <li>• Prevent unauthorized access to, use, or disclosure or removal of the Company's property, records, data, and information.</li> <li>• Enhance employee productivity.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy.</li> <li>• Exercise or defend the legal rights of the Company and its employees, customers, contractors, and agents.</li> </ul>	<p>No</p>
<p>Geolocation data such as the time and physical location related to use of an internet website, application, or device, and GPS location data from mobile devices of employees who participate in a vehicle reimbursement program.</p>	<ul style="list-style-type: none"> <li>• Improve safety of employees, customers, and the public regarding use of the Company property and equipment.</li> <li>• Prevent unauthorized access, use, or loss of the Company property.</li> <li>• Improve efficiency, logistics, and supply chain management.</li> <li>• Ensure employee productivity and adherence to the Company's policies.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy.</li> </ul>	<p>No</p>
<p>Professional or employment-related information such as employment application information (work history, academic and professional qualifications, educational records, references, and work authorization).</p>	<ul style="list-style-type: none"> <li>• Recruit and process employment applications, including verifying eligibility for employment, background checks, and onboarding.</li> <li>• Design and administer employee benefit plans and programs, including for leaves of absence.</li> <li>• Maintain personnel records and comply with record retention requirements.</li> <li>• Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>• Prevent unauthorized access to or use of the Company's property, including its information systems, electronic devices, network, and data.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company policy.</li> <li>• Exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and agents.</li> </ul>	<p>No</p>

Non-public education information, such as education records, degrees and vocational certifications obtained, report cards, and transcripts.	<ul style="list-style-type: none"> <li>Evaluate an individual's appropriateness for hire, or promotion or transfer to a new position at the Company.</li> </ul>	No
Inferences drawn from other personal information for example, an individual's preferences, abilities, aptitudes, and characteristics.	<ul style="list-style-type: none"> <li>Engage in human capital analytics, including to identify correlations about individuals and job success, analyze data to improve retention and productivity, and analyze employee preferences to inform human resources policies and procedures.</li> <li>Conduct applicant reference checks to assist in hiring decisions.</li> </ul>	No
Other personal information description	n/a	No

<b>Sensitive personal information category</b>	<b>Business purpose</b>	<b>Sold or shared for cross-context behavioral advertising</b>
Government identifiers, such as your social security number, driver's license, state identification card, passport and visa information, and immigration status and documentation.	<ul style="list-style-type: none"> <li>Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks.</li> <li>Process and administer payroll and employee benefit plans, including enrollment and claims handling.</li> <li>Maintain personnel records and comply with record retention requirements.</li> <li>Provide employees with human resources management services and employee data maintenance and support services.</li> <li>Communicate with employees and their emergency contacts and plan beneficiaries.</li> <li>Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data.</li> <li>Respond to law enforcement requests and as required by applicable law or court order.</li> </ul>	No
Precise geolocation	<ul style="list-style-type: none"> <li>Improve safety of employees, customers, and the public regarding use of the Company property and equipment.</li> <li>Prevent unauthorized access, use, or loss of the Company property.</li> <li>Improve efficiency, logistics, and supply chain management.</li> <li>Ensure employee productivity and adherence to the Company's policies.</li> <li>Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy.</li> <li>Exercise or defend the legal rights of the Company and its employees, affiliates, clients, contractors, and agents.</li> </ul>	No
Racial or ethnic origin	<ul style="list-style-type: none"> <li>Comply with federal and state equal employment opportunity laws.</li> <li>Design, implement, and promote the Company's diversity and inclusion programs.</li> <li>Perform workforce analytics, data analytics, and benchmarking.</li> <li>Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy.</li> </ul>	No

California law permits our customers who are California residents to request certain information about our disclosure of personal data to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. **AAR does not sell or share your personal information with other businesses for direct marketing.**

California residents may request access to their personal information, the specific categories of personal information that AAR has collected about them, the business or commercial purposes for collecting the personal information, the categories of third parties with whom the information was shared, and the deletion of their personal information, subject to certain exceptions. You may be required to verify your identity before we fulfill your request. If you designate an authorized agent to make a request on your behalf, we will need to receive a copy of your valid power of attorney and the agent's valid government-issued identification. California residents have the right to request this information twice in any 12-month period, free of charge. Requests may be submitted via any method listed in our [Contact information](#) section below.

AAR will not discriminate against California residents who exercise their rights under CCPA.

### **Additional international privacy rights**

AAR CORP's headquarters are in the United States, and AAR operates on a global basis. Your personal information may be collected, transferred, and / or stored in the United States or internationally. AAR will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests. For example, data may be transferred under written contractual agreements. For cross-border transfers of personal data from the EU to the United States, AAR may use transfer mechanisms such as standard contractual clauses.

If you are in the European Union or the United Kingdom, you have the right to contact us for more information about the safeguards we have in place to ensure the adequate protection of your personal information when it is transferred. You also have the right to access, the right to the rectification of inaccurate personal information, the right to restriction of processing, and the right to erasure of your personal information, subject to certain exceptions. See the [Contact information](#) section if you wish to reach us to exercise any of these rights.

If you are in the European Union or the United Kingdom, your use of our websites will not subject you to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and have notified you.

We will make every attempt to resolve your concerns or issues if you contact us. You also have the right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal data.

### **Data security**

AAR takes the security of your personal information seriously. We use reasonable and appropriate measures designed to maintain the personal information we collect in a secure manner appropriate to the risk. We have taken certain physical, electronic, and administrative steps to safeguard and secure your personal information from unauthorized or illegal access, destruction, use, modification, or disclosure. The security of your information also depends in part on the security of the computer you use to connect with us and your protection of your login and password information. Please take appropriate measures to protect your devices and information.

### **How long we keep your personal information**

It is AAR's policy to retain your personal information only for as long as necessary for the purpose(s) for which it was collected. We may retain your personal information for as long as we need it to provide our services, resolve disputes, provide legal defense, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

### **Protecting children's privacy**

Our websites are not intended for children. We do not intentionally gather personal information about website users who are under the age of 16. If you are under the age of 16, do not submit any personal information to us.



### **Links to other websites**

Our websites may contain links to third-party websites, such as social media sites like Twitter or LinkedIn which will have their own privacy practices. This Privacy Notice only addresses our collection and use of your personal information; it does not address how third-party sites may collect or use your information even if you access third-party sites from our website. We are not responsible for any actions taken by third-party websites. We recommend that you review and understand their privacy practices before using their websites or disclosing personal information to them.

### **Changes to our Privacy Notice**

We may change our Privacy Notice from time to time, including as required to keep current with rules and regulations, new technologies and security standards. When we do, we will revise the “last modified” date at the top of the Privacy Notice. Please check our websites for updates. We want you to be fully aware of the personal information we may collect and how it may be used.

### **Contact information**

If you have questions or concerns about our use of your personal information, or if you wish to exercise your rights, please contact us.

By mail:

Attn: Data Privacy Dept.  
AAR CORP.  
1100 N. Wood Dale Rd.  
Wood Dale, IL 60191 USA

By email:

[PRIVACY@AARCORP.com](mailto:PRIVACY@AARCORP.com)

Through our website:

Use [Contact Us](#) to send a message

By telephone:

US toll free: +1-800-422-2213