
AIRCRAFT.**Market**

Operated by Four Avio

Privacy Policy

How Four Avio collects, uses and protects your personal data

Version: 2026.1

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Last Updated: June 2026

Governing Law: Emirate of Dubai, United Arab Emirates

1. Introduction and Identity of Data Controller

This Privacy Policy ("Policy") describes how Four Avio ("Four Avio", "we", "us", "our"), a company duly registered and operating in the Emirate of Dubai, United Arab Emirates, collects, processes, stores and protects personal data in connection with the Aircraft.Market online platform ("Platform") accessible at aircraft.market and any associated mobile applications or services.

By accessing or using the Platform, you acknowledge that you have read, understood and agree to the terms of this Policy. If you do not agree with this Policy, please do not use the Platform.

Four Avio is the Data Controller for personal data processed through the Platform, as defined under:

- UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data ("UAE PDPL");
- Dubai International Financial Centre Data Protection Law DIFC Law No. 5 of 2020 (where applicable);
- Any implementing regulations issued thereunder.

2. Personal Data We Collect

2.1 Data Provided Directly by You

- Registration and Account Data: full name, email address, password (hashed), phone number, company name, job title, LinkedIn URL, professional speciality and geographic region.
- Listing Data: aircraft specifications, MSN, engine serial numbers, pricing, photos, documentation and any technical data you submit to create listings.
- Enquiry and Communication Data: messages, attachments, telephone call records and correspondence exchanged through the Platform or by email.
- Broker Verification Data: company registration number, VAT/tax identification number, ICAO operator certificates, professional references and identity verification documents.
- Billing Data: billing contact details, PO numbers and invoice preferences. Note: Four Avio does not store full payment card data; card processing is handled by certified third-party payment processors.

2.2 Data Collected Automatically

- Log and Technical Data: IP address, browser type, operating system, referring URL, pages visited, timestamps and session duration.
- Cookie and Tracking Data: session identifiers, preference cookies, analytics cookies and marketing cookies (see Section 10).
- Device Data: device type, unique device identifiers, operating system version.

2.3 Data Received from Third Parties

- Identity and company verification data from commercially available business registries, ICAO databases and professional background-check providers.
- LinkedIn or other professional network profile data where you use social login or link your account.

3. Purposes and Legal Basis for Processing

Four Avio processes personal data for the following purposes and on the following legal bases:

- **Contract Performance:** to register your account, verify your identity as a broker, deliver Platform services including listing management, enquiry routing, and subscription billing. Legal basis: performance of a contract to which you are a party.
- **Legitimate Interests:** to improve Platform features, prevent fraud and misuse, maintain security, conduct analytics, and operate our broker verification programme. Legal basis: legitimate interests of Four Avio.
- **Legal Compliance:** to comply with anti-money laundering requirements, tax laws, sanctions screening, and applicable UAE and international regulations. Legal basis: compliance with a legal obligation.
- **Consent:** to send marketing communications and newsletter updates where you have opted in. Legal basis: your explicit consent, which you may withdraw at any time.

4. Disclosure of Personal Data to Third Parties

Four Avio does not sell, rent or trade your personal data to third parties for their own marketing purposes. We may share personal data with:

- **Counterparties in Transactions:** when you submit or respond to a listing enquiry, your contact details (name, company, email, phone) are disclosed to the counterparty for the purpose of facilitating the transaction. You consent to this disclosure when submitting an enquiry.
- **Service Providers:** cloud hosting providers, payment processors, email delivery services, analytics platforms and KYC/AML verification providers, all operating under data processing agreements and bound by confidentiality obligations.
- **Professional Advisers:** lawyers, auditors and accountants where necessary.
- **Regulatory and Law Enforcement Authorities:** where required or permitted by applicable UAE law, court order, regulatory direction or to protect the rights, property or safety of Four Avio, its users or third parties.
- **Business Transfers:** in the event of a merger, acquisition, reorganisation or sale of all or part of Four Avio's business, personal data may be transferred to the acquirer, subject to equivalent data protection obligations.

5. International Transfers of Personal Data

Aircraft.Market operates as a global platform. Personal data may be transferred to and processed in countries outside the UAE, including countries in the European Economic Area, United Kingdom, United States and Asia Pacific. Such transfers are made subject to appropriate safeguards including:

- Standard contractual clauses or equivalent approved transfer mechanisms;
- The recipient country providing an adequate level of data protection as determined by competent UAE authorities; or
- Your explicit consent to the transfer.

6. Data Retention

Four Avio retains personal data for as long as necessary to fulfil the purposes for which it was collected, to comply with legal obligations, resolve disputes and enforce agreements. Specific retention periods include:

- **Account data:** for the duration of your account plus five (5) years following account closure.
- **Listing and transaction data:** seven (7) years from the date of the last transaction or listing, to comply with UAE financial record-keeping requirements.
- **Marketing data:** until you withdraw consent or opt out.

- Log and security data: up to twelve (12) months.

Upon expiry of the applicable retention period, personal data is securely deleted or anonymised in accordance with Four Avio's data destruction procedures.

7. Your Rights Under UAE Data Protection Law

Subject to applicable law and verification of your identity, you have the following rights in respect of your personal data:

- Right of Access: to request a copy of the personal data we hold about you.
- Right to Rectification: to request correction of inaccurate or incomplete data.
- Right to Erasure: to request deletion of your personal data where it is no longer necessary for the purpose for which it was collected, subject to our legal retention obligations.
- Right to Restriction: to request that we restrict processing of your personal data in certain circumstances.
- Right to Object: to object to processing based on legitimate interests or for direct marketing purposes.
- Right to Data Portability: to receive your personal data in a structured, commonly used and machine-readable format.
- Right to Withdraw Consent: to withdraw consent at any time where processing is based on consent, without affecting the lawfulness of prior processing.

To exercise your rights, please contact us at: info@aircraft.market. We will respond within thirty (30) calendar days. If you believe your rights have been infringed, you may lodge a complaint with the UAE competent authority.

8. Data Security

Four Avio implements appropriate technical and organisational security measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures include:

- Transport Layer Security (TLS 1.3) encryption for all data in transit;
- AES-256 encryption for sensitive data at rest;
- Hashed and salted password storage;
- Role-based access controls and least-privilege access principles;
- Regular security assessments and penetration testing;
- Incident response procedures aligned with UAE PDPL notification requirements.

In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, Four Avio will notify affected individuals and the competent authority within the timeframes required by applicable UAE law.

9. Children's Privacy

The Platform is not directed to individuals under the age of eighteen (18) years. Four Avio does not knowingly collect personal data from minors. If you believe we have inadvertently collected data from a minor, please contact us immediately and we will delete such data.

10. Cookies and Tracking Technologies

The Platform uses cookies and similar tracking technologies for the following purposes:

- Strictly Necessary Cookies: required for Platform functionality and cannot be disabled.
- Performance / Analytics Cookies: help us understand how users interact with the Platform (e.g., Google Analytics). We anonymise IP addresses.
- Functional Cookies: remember your preferences and settings.
- Marketing Cookies: used to deliver relevant advertisements. Enabled only with your consent.

You may manage your cookie preferences through our Cookie Consent Manager accessible in the Platform footer, or by adjusting your browser settings. Note that disabling strictly necessary cookies may affect Platform functionality.

11. Disclaimer — No Responsibility for Third-Party Data

FOUR AVIO IS NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OF SELLERS, BUYERS, BROKERS OR ANY OTHER THIRD PARTIES WHO MAY ACCESS YOUR PERSONAL DATA THROUGH YOUR USE OF THE PLATFORM. ANY DATA SHARED WITH A COUNTERPARTY IN THE COURSE OF A TRANSACTION IS SUBJECT TO THAT PARTY'S OWN PRIVACY PRACTICES. FOUR AVIO STRONGLY RECOMMENDS THAT YOU REVIEW THE PRIVACY POLICIES OF ANY THIRD PARTY WITH WHOM YOU ENGAGE THROUGH THE PLATFORM.

12. Changes to This Policy

Four Avio reserves the right to modify this Policy at any time. Material changes will be notified to registered users by email and by a prominent notice on the Platform at least fourteen (14) calendar days before the changes take effect. Your continued use of the Platform after the effective date constitutes acceptance of the revised Policy.

13. Governing Law and Jurisdiction

This Policy is governed by and construed in accordance with the laws of the Emirate of Dubai and the federal laws of the United Arab Emirates. Any dispute arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the competent courts of Dubai, United Arab Emirates, or, where the processing is carried out within the DIFC, the DIFC Courts.

14. Contact

For any questions, requests or complaints regarding this Privacy Policy or our data processing activities, please contact:

- Contact: info@aircraft.market
- Company: Four Avio, Dubai, United Arab Emirates