

## **General Statement of Privacy**

Professional Flight Management, Inc. (PFM) respects the privacy of its clients and of those who visit PFM web-sites.

This Privacy Policy applies to business visitors and clients visiting the websites provided and maintained by PFM including:

- [www.PFMsys.com](http://www.PFMsys.com) – the “commercial website”
- demonstration websites established for potential clients to try the applications and services provided by PFM
- client websites maintained under contract.

PFM complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. PFM has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor/>.

## **Information We Collect**

When you visit one of the PFM websites mentioned above, our Web server automatically recognizes the domain name of your computer or Web-enabled device. We may also collect information on what pages users access or visit, as described below. We do maintain and host databases and data structures used by our clients to maintain information required to manage and report on their flight operations.

Our clients collect information on passengers and crew required to support flight operations including government regulatory requirements.

## **Use of Information by PFM and Others**

We do not examine or use any client information entered into databases or tables except as may be allowed or required under contract to support client operations.

PFM may use information collected about visitors to our commercial and demonstration websites to:

- fulfill purchase and other requests made by visitors;
- improve the content of our websites;
- customize the content and/or layout of Web pages for individual visitors;
- contact members and those who visit our public sites about new products and services or upcoming events;
- notify visitors about updates to our websites;
- contact visitors for marketing purposes;
- disclose information, when legally required to do so, at the request of governmental authorities conducting an investigation; and to
- verify or enforce compliance with the policies governing our websites and applicable laws, or to protect against misuse or unauthorized use of our websites.

PFM does not share information collected through our websites with external agents or contractors nor do we rent email addresses to third-party organizations.

## **Use of Cookies and Browser-Level Information**

A "cookie" is a small piece of information that a website can store in a designated file on your computer or Web-enabled device. Cookies can be used, among other things, to identify your computer or device when you log into a website and may track your IP address in order to do so.

When you visit our websites, we may use cookies to collect aggregate information on the number of visitors to our site and the number of pages viewed. While PFM does analysis of its website logs to monitor the flow of traffic and make improvements to the site's content, its website logs are not personally identifiable, and no attempt is made to link them to individual visitors to this site. This information is used only by PFM and is not shared with any third-party companies.

If you register through one of our websites, we may place a unique identifier cookie that is used to maintain your "sign on" status for the duration of your visit to the site, customize or tailor your visit and to store your user preferences for that site over time. We also use cookies to track the pages visited so that we can deliver PFM Web content based on a visitor's profile (as provided by the visitor) and the visitor's past activity on that site. The use of these cookies also enables our sites to customize the Web page content based on a visitor's browser type or other information that the visitor sends.

## **Choices About Data Collection and Use**

We may allow advertisements to be placed on our public websites by third-party organizations. Those organizations may collect web-reporting data on their placed advertisements.

If you do not wish to receive information about new PFM products and services, or upcoming events, you may opt-out of receiving promotional DMA communications by sending an email request to [pfm@pfmsys.com](mailto:pfm@pfmsys.com). In your email, please indicate which mode(s) of communication you would like to opt-out of (postal mail, email or telephone contact).

You can also contact us by mail or phone:

Professional Flight Management, Inc.  
555 E City Ave, Bala Cynwyd, PA 19004.  
Tel: 610.688.1655  
Fax: 484.270.9837  
Email: [pfm@pfmsys.com](mailto:pfm@pfmsys.com)

Visitors can also choose not to accept cookies. Your Web browser may alert and permit you to refuse cookies. Please check with the company operating your browser for more information on how to change those browser-level settings. Please note that disabling cookies for some services may affect your ability to use that service.

## **Access and Correction**

Upon your request, we will provide you with the opportunity to review and correct the contact and any payment information that we maintain about you. We cannot provide access to information contained in passenger or crew databases except to PFM clients directly. Any requests for such information must be made to the client. If you wish to review the accuracy of the information you have provided to PFM, please send an email request to [pfm@pfmsys.com](mailto:pfm@pfmsys.com). PFM will promptly notify clients if any unauthorized person accesses, uses, or discloses any Personal Information, or if any individual requests access to, correction of, or revokes consent for use of, personal information. We will accommodate all reasonable requests unless specifically excluded by contract. Further, PFM either returns or destroys all Personal Information and other tangible materials that are client Confidential Information on request at the conclusion of a contract.

## **Privacy Complaints by European Union Citizens**

In compliance with the Safe Harbor Principles, PFM commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact PFM at:

Geoffrey Barnes  
Email: [Phil@PFMSys.com](mailto:Phil@PFMSys.com)  
Telephone: +1.484.436.2349  
Fax: +1.484.270.8937

PFM has further committed to refer unresolved privacy complaints under the Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU Safe Harbor, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by PFM, you may contact:

Council of Better Business Bureaus, Inc.  
BBB EU Safe Harbor  
4200 Wilson Boulevard, Suite 800  
Arlington, VA 22203  
Phone: 703-276-0100  
Web: [www.bbb.org/us](http://www.bbb.org/us)  
Email: [eusafeharbor@council.bbb.org](mailto:eusafeharbor@council.bbb.org)

## **Security**

We use industry-standard encryption technologies when transferring and receiving sensitive data. We have security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from or about you.

## **Changes to This Privacy Policy**

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. Any material changes to this privacy policy will be communicated to users through this Web page, so please be sure to visit this page periodically.

## **Questions**

Please be assured that we take your concerns about privacy quite seriously, and we intend to take every reasonable effort to protect your privacy. If you have any questions about PFM's privacy practices, please contact us directly.

Privacy Policy Effective Date: April 30, 2011. Updated 24 August, 2011