

## **Introduction**

Pre, LLC., d/b/a Pangiam is the owner of technology solution known as veriScan, and will process Personal Data in accordance with applicable law and this Privacy Statement. Pangiam respects individual privacy and values the confidence of such individuals. This Privacy Statement sets forth Pangiam's privacy principles with respect to Personal Data, including the implementation of privacy procedures and technical security measures to keep Personal Data private and secure, which Pangiam follows in its normal course of business.

## Scope

This Privacy Statement applies to Personal Data received by Pangiam from airline departure control systems and travelers in connection with the operations and use of the Site and the veriScan system.

## Definitions

For the purposes of this Privacy Statement, the following definitions shall apply:

“Pangiam” shall mean Pangiam or any of its affiliated companies, including Pangiam Labs, Linkware, LLC., and/or others

“Personal Data” is data about an identified or identifiable individual that is within the scope of applicable law, including Regulation (EU) 2016/679, received by an organization in the United States from the European Union and recorded in any form.

“veriScan system” refers to the technology solution used to authenticate the identity of individuals via facial recognition.

“Site” refers to the veriScan web page; [www.aviationveriscan.com](http://www.aviationveriscan.com).

“Sensitive Personal Data” is Personal Data which includes information such as unique government identification credentials, race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health, sexual orientation, or criminal allegations (convictions or otherwise), or is otherwise defined by the Principles as “sensitive information” (see, e.g., Commission Implementing Decision (EU) 2016/1250, Annex II § II.2.c).

## Pangiam Privacy Statement

**Notice:** veriScan will only process Personal Data as required by law or as specified herein for the purposes of this Privacy Statement.

### PURPOSE FOR COLLECTION, USE, AND DISCLOSURE OF PERSONAL DATA

Pangiam may collect, use, and disclose Personal Data in its normal course of business with respect to the Site and the veriScan system for the following purposes:

- In conjunction with U.S. Customs and Border protection (CBP) systems for the identification authentication activities defined by the CBP's Air Entry and Exit programs;
- Meeting legal, security, processing, and regulatory requirements;
- In conjunction with airline departure control systems;
- Providing the veriScan technology solution to Pangiam business partners; and
- Compiling statistics for analysis of the veriScan site and services.

## **WHAT DATA WE COLLECT**

As part of how we provide the veriScan service, Pangiam may be provided Personal Data from third party sources. Generally, this information is limited to the authorization by CBP of an individual to board an aircraft at a participating airline gate.

When interacting with the veriScan system, individuals will provide us with photographic information in order to provide the veriScan service.

### **Where you request information via the Site**

If, while interacting with the Site, you request further information about our services, we may require you to submit your name, e-mail address, the name of your organization, and the country in which you are based.

### **Where you register with us and/or request services via the Site**

If you register with the Site, or request a service available on the Site, we may ask you for your name, e-mail address, country, telephone number, and the reason for your communication; as well as information about your position, organization, and such other information as is reasonably necessary so that we can respond. If we ask for such information, then on the data submission form, we shall indicate by way of an asterisk which information is optional and which information is mandatory.

Individuals should not provide Pangiam with any Personal Data that is not specifically requested. Where Pangiam receives Personal Data from other entities, it will use or disclose such Personal Data in accordance with the above procedures.

Pangiam may consolidate or aggregate Personal Data in a non-identifiable form (anonymized/pseudonymized data) to help Pangiam improve product design and services, to enhance Pangiam's research activities, and to facilitate other business functions.

## **DISCLOSURE OF INFORMATION TO OTHERS**

We do not disclose any Personal Data about you collected via the veriScan service or the Site to any third parties except as stated in this Privacy Policy, as otherwise permitted by law, or authorized by you.

### **Generally**

Third parties to whom we disclose information are required by law and contractual undertakings to keep your Personal Data confidential and secure, and to use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation, which purposes are as follows:

- For legal, regulatory, and related purposes; and
- To manage the Site via data processing service providers.

If these third parties wish to use your Personal Data for any other purpose, they will have a legal obligation to notify you of this and, where required, to obtain your consent. Contact us at [veriscan@pangiam.com](mailto:veriscan@pangiam.com) for more information on these third parties.

### **Service Providers**

Because a number of the service providers we use are located in the United States, your Personal Data will be processed and stored inside the United States; and the U.S. government, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Data under U.S. laws.

## Other Legally Required Disclosures

Pangiam reserves the right to disclose without your prior permission any Personal Data about you or your use of this Site if Pangiam has a good faith belief that such action is necessary: (a) to protect and defend the rights, property, or safety of Pangiam, employees, other users of this Site, or the public; (b) to enforce the terms and conditions that apply to use of this Site; (c) as required by a legally valid request from a competent governmental authority; or (d) to respond to claims that any content violates the rights of third parties. We may also disclose Personal Data as we deem necessary to satisfy any applicable law, regulation, legal process, or governmental request.

### Choice:

Pangiam generally does not rely on consent as the basis for processing. We usually rely on our legitimate interest in providing the veriScan service as the fair and lawful basis for processing Personal Data. However, there may be times when we do rely on consent for such processing. Your knowledge of and consent to Pangiam's collection, use, and disclosure of your Personal Data is important **when we use consent as a basis** for processing Personal Data. We rely on your voluntary provision of Personal Data to us directly as the indication of your consent to our Personal Data handling practices.

**Where Pangiam relies on consent** for the fair and lawful processing of Personal Data, the opportunity to consent will be provided when the Personal Data in question is collected. Your consent may be given through your authorized representative, such as a legal guardian, agent, or holder of a power of attorney.

As it relates to your use of the Site and the veriScan service, Pangiam maintains servers and other storage facilities in the United States. As a consequence of your use of the site or the veriScan service, your Personal Data may be used or stored in the United States. Regarding data collected by the site, your use of the site is affirmative consent to the processing of your Personal Data in a country which may not have the same level of privacy protection as your country of residence. Should you withdraw this consent,

you agree that you will not use or visit the Site subsequent to your withdrawal of such consent.

**Where Pangiam relies on consent** for the fair and lawful processing of Personal Data, and subject to certain legal or contractual restrictions and reasonable notice, you may withdraw consent at any time. Pangiam will inform you of the consequences of withdrawing your consent. In some cases, refusing to provide certain Personal Data or withdrawing consent for Pangiam to collect, use, or disclose your Personal Data could mean that we cannot provide the requested services or information to you.

If you wish to withdraw consent please refer to the contact information section below.

However, there are a number of instances where Pangiam does not require your consent to engage in the processing or disclosure of Personal Data. Pangiam may not solicit your consent for the processing or transfer of Personal Data for those purposes which have a statutory basis, such as:

- The transfer or processing is in our legitimate interest for the provision of the veriScan service;
- The transfer or processing is necessary for the performance of a contract between you and Pangiam;
- The transfer or processing is necessary for the performance of a contract, concluded in your interest, between Pangiam and a third party;
- The transfer or processing is necessary or legally required on important public interest grounds; for the establishment, exercise, or defense of legal claims, or to protect your vital interests; or
- The transfer or processing is required by applicable law.

For Sensitive Personal Data, Pangiam will provide individuals the opportunity to affirmatively and explicitly authorize or consent to the collection, processing, transfer, or disclosure of their Sensitive Personal Data to a non-agent third party or to the use of

their Sensitive Personal Data for a purpose other than the one for which the individual originally consented.

Pangiam will not disclose your Personal Data to third parties except as otherwise stated in this Privacy Statement.

**Accountability for Onward Transfers:** Pangiam will obtain assurances from any service providers, if any, that they will safeguard Personal Data consistent with this Privacy Statement. An example of appropriate assurances that may be provided by service providers includes a contractual obligation that the service providers provide at least the same level of protection as is required by Pangiam's privacy Principles set out in this Statement. Where Pangiam has knowledge that a service provider is using or disclosing Personal Data in a manner contrary to this Privacy Statement, Pangiam will take appropriate steps to prevent or stop the use or disclosure.

In addition, Pangiam may transfer Personal Data collected by the Site outside of the individual's country of residence for the purposes and in the manner set out above; including for processing and storage by service providers in connection with such purposes. In all situations, Pangiam takes reasonable steps to ensure that your privacy is protected. Such steps include, but are not limited to, implementing privacy, security, and contractual controls, as well as steps noted above, as required by applicable law. To the extent that any Personal Data is sent out of an individual's country of residence, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country, consistent with the Principles.

**Security:** Pangiam has implemented reasonable physical, technical, and managerial controls and safeguards to keep your Personal Data protected from unauthorized access, disclosure, alteration, and destruction.

**Data Integrity and Purpose Limitation:** Pangiam will use Personal Data only in ways that are compatible with the purposes for which it was collected or consented to by the

individual. Pangiam will have appropriate steps in place to ensure that Personal Data is relevant to its intended use, accurate, complete, and current. Pangiam will only store Personal Data for as long as it is needed to fulfill the purposes for which it was collected, subject to applicable data retention periods determined by Pangiam as a result of applicable law.

**Access and Correction:**

Upon written request, Pangiam will grant individuals access to Personal Data that it holds about them, subject to any legal restrictions. In addition, Pangiam will permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete, subject to certain exceptions provided by law. In some instances, applicable law or regulatory requirements allow or require Pangiam to refuse to provide some or all of an individual's Personal Data. In addition, Personal Data may have been destroyed, erased, or made anonymous in accordance with Pangiam's record retention obligations and practices. In the event that Pangiam cannot provide an individual with access to his/her Personal Data, Pangiam will endeavor to provide the individual with an explanation, subject to any legal or regulatory restrictions.

**Review:**

Pangiam will conduct periodic compliance audits of its relevant privacy practices to verify adherence to this Privacy Statement.

**Contact Information:**

Any questions or concerns regarding handling of Personal Data related to revocation of consent to collect, process, transfer, or disclose your Personal Data should be directed by email to [veriscan@pangiam.com](mailto:veriscan@pangiam.com)

All communications to Pangiam should include the individual's name and contact information (such as e-mail address, phone number, or mailing address), and a detailed explanation of the request. E-mail requests to delete, amend, or correct Personal Data should include "Deletion Request" or "Amendment/Correction Request," as applicable, in the subject line of the e-mail. Pangiam will endeavor to respond to all reasonable requests in a timely manner, and in any case, within any time limits prescribed by applicable law.

### **Changes To Pangiam Privacy Statements**

Pangiam reserves the right to amend this Privacy Statement from time to time to reflect technological advancements, legal and regulatory changes, and Pangiam's business practices, subject to applicable laws. If Pangiam changes its privacy practices, an updated version of this Privacy Statement will reflect those changes. Pangiam will provide notice of such changes by updating the effective date listed on this Privacy Statement. It is your responsibility to check this Privacy Statement frequently to view any amendments. Your continued interaction with Pangiam, in the activities covered above, will be subject to the then-current Privacy Statement.

**Last Updated: April 2, 2021**