ARACE Kft. – Privacy Notice for Clients, Partners and Suppliers

Version 1.0 | *Effective: November 10, 2026*

This notice explains how ARACE Kft. processes personal data of the contact persons of its clients, distributors, partners and suppliers, in accordance with Regulation (EU) 2016/679 (GDPR) and Hungarian law.

1. Data controller

ARACE Kft., 1225 Budapest, Tétényliget utca 5., Hungary | Company reg. no.: 01-09-424540 | Tax no.: 26093255-2-43 | Email: office@araceuas.com | Phone: +36 30 445 8884 | Website: www.araceuas.com

ARACE Kft. is not required to appoint a Data Protection Officer. Privacy questions and requests can be sent to office@araceuas.com.

2. Whose data we process

ARACE sells exclusively to businesses, institutions and public bodies. We process personal data of individuals acting on their behalf, such as contact persons, signatories, purchasing staff, pilots and trainees, end-user representatives, and the contact persons of our suppliers and service providers.

3. What we process, why, and on what legal basis

Enquiries and quotations. Name, company, position, email, phone and the content of the enquiry, including messages sent by email, WhatsApp or other channels. Purpose: answering enquiries and preparing quotations. Legal basis: steps prior to a contract (GDPR Art. 6(1)(b)) or our legitimate interest in communicating with business contacts (Art. 6(1)(f)).

Orders and contract performance. Name, company, position, contact details, delivery address, signature, and order history. Purpose: concluding and performing contracts, delivery, warranty and support. Legal basis: performance of a contract (Art. 6(1)(b)) or, where the contract is with the contact person's employer, our legitimate interest in performing that contract (Art. 6(1)(f)).

Invoicing and accounting. Name and data appearing on invoices and payment records. Purpose: compliance with tax and accounting law. Legal basis: legal obligation (Art. 6(1)(c)).

Export control and end-use checks. Names and identification details of end users and authorised representatives, end-user certificates, and sanctions screening results. Purpose: complying with EU and Hungarian export control and sanctions law, including dual-use licensing. Legal basis: legal obligation (Art. 6(1)(c)) and legitimate interest (Art. 6(1)(f)).

Training and certification. Name, organisation, training dates, attendance and certification records of pilots and trainees. Purpose: delivering training, issuing certificates, and assessing warranty claims. Legal basis: performance of a contract and legitimate interest (Art. 6(1)(b) and (f)).

Warranty and support. Contact details, flight logs, telemetry, photos and videos supplied with a claim. Purpose: assessing and handling warranty and repair requests. Legal basis: performance of a contract and legitimate interest (Art. 6(1)(b) and (f)).

Legal claims. Any of the above, where necessary to establish, exercise or defend legal claims. Legal basis: legitimate interest (Art. 6(1)(f)).

We do not use client contact data for automated decision-making or profiling. We send marketing messages only to existing business contacts about similar products, and you may opt out at any time.

4. How long we keep data

- Accounting documents and invoices: 8 years, as required by the Hungarian Accounting Act.
- Contracts, order and warranty records: 5 years after the contract ends (general limitation period), or longer if a dispute is pending.
- Export control documentation: as long as required by the applicable export licence and law, at least 5 years.
- Enquiries that did not lead to an order: up to 2 years after the last contact.
- Training records: for the life of the related products and warranty, at most 5 years after the last training.

5. Who receives the data

We share personal data only where necessary, with:

- our accountant and payroll provider;
- IT and cloud service providers we use for email, file storage and business management (for example Microsoft, Dropbox and Odoo);
- carriers and logistics providers (for example DHL) for deliveries;
- authorised distributors and partners involved in the order or training;
- public authorities where required by law, including tax, customs and export control authorities.

Service providers act as data processors under written agreements and may process data only on our instructions.

6. Transfers outside the EU

Some service providers may process data outside the European Economic Area. In such cases we rely on an adequacy decision of the European Commission (such as the EU–US Data Privacy Framework) or on the European Commission's Standard Contractual Clauses. Where we deliver to clients outside the EU, data necessary for the delivery and export procedure is transferred to the recipient country as necessary for the performance of the contract.

7. Security

We protect personal data with appropriate technical and organisational measures, including access restrictions, password protection, encrypted connections and regular backups.

8. Your rights

You have the right to request access to, rectification or erasure of your personal data, restriction of processing, and data portability, and to object to processing based on legitimate interest. Requests can be sent to office@araceuas.com. We respond within one month.

You may lodge a complaint with the Hungarian supervisory authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH), 1055 Budapest, Falk Miksa utca 9-11., www.naih.hu, or with the supervisory authority in your country, or bring the matter before a court.

9. Changes

We may update this notice from time to time. The current version is available at www.araceuas.com and on request.