

PRIVACY POLICY

Last updated: March 7, 2026

WingOps OÜ (“WingOps”, “we” or “us”) is committed to respecting and safeguarding your privacy rights.

This Privacy Policy explains your rights with respect to your personal data and describes how we process it through your use of wingops.aero (“Website”) and services, product, software and other interactions you may have with us that are subject to this Privacy Policy (collectively referred to as our “Services”).

WingOps takes global approach to the privacy and our processing activities are in line with applicable data protection laws, including but not limited to the European Union’s General Data Protection Regulation 2016/679 (“GDPR”), the United Kingdom’s Data Protection Act of 2018 along with the UK GDPR as retained as UK law by the European Union Withdrawal Act 2018 and California Consumer Privacy Act as amended by the California Privacy Rights Act (collectively “CCPA”).

1. Our Relationship With You

In situations where you are subject to our Terms and Conditions (in conjunction or without Services Agreement) to use Services, WingOps is the data processor, meaning that we will process personal data on behalf of a data controller, and our customer (usually a company or an individual) is the data controller - the entity that determines how and why personal data is processed. In other cases, WingOps is the data controller of the processing of personal data.

WingOps can be used by companies or by individual users: if you’re using WingOps through your company or with your company email address, your company’s own WingOps administrator is responsible for the accounts associated with that company and can, therefore, restrict, suspend, or terminate your access to or ability to use the Services, which may result in you losing control of the processing of your personal data.

2. What Personal Data We Process And How We Obtain Them

We may collect and process different types of personal data in the course of operating our Website and providing our Services.

1. These may include, but is not limited to information obtained directly from you which is needed to create an account and provide the Services, such as:
 - Full name and email address;
 - Your password for WingOps (unique and hashed).
2. When you pay for WingOps subscription plan we may process the following personal data:

- Billing information, such as name, address, or telephone number;
 - Financial information, such as bank card information collected by our payment processors on our behalf;
 - Information about your chosen WingOps subscription plan.
3. When you use WingOps account you may voluntarily provide us with the following information:
- Personal data included in work tasks, work logs, messages, files, contact lists, and any other business information you provided when using the Services;
 - Information uploaded in the WingOps account, such as attachments, certificates;
 - Professional or employment information, such as your title or role at your company;
 - Any other information you choose to voluntarily provide while using Services.
4. When you use the Services and our Website we may indirectly obtain the following information:
- Security Data: This may include IP addresses, browser type and settings, domain names, URLs, number of clicks, date and time stamp information, language preferences, and other such information.
 - Analytics Data: In our use of analytics tools we do collect general geographic data, but it is only on an aggregate basis and not specific to an individual's exact location. We use performance cookies to track user traffic patterns and hold certain registration information. Please see our Cookies Notices for more information.

3. How We Use Your Personal Data

WingOps uses your personal data for a specific purpose and under specific legal basis. We may process your personal identifiers such as your full name and email address in order to:

- Provide Services to you and operate our business;
- Maintain and improve our Services and the Website;

We may use Security Data and Analytics Data to:

- Help us better understand your interests and needs, and customise WingOps for you;
- Analyze and research how you interact with our Website;
- Protect WingOps' and your legal rights, for example:
 - Securing our systems and Services against fraud or unauthorised activity;
 - Identifying, troubleshooting, and fixing bugs and errors;
 - Complying with Estonian, EU and global laws and regulations.
- Comply in good faith with a valid legal request from a governmental authority.

We may use personal data such as your email address and name in order to:

- Communicate with you via email or respond to your inquiries;
- To provide important notices and updates, product changes, and other necessary notices;
- To advertise or market Services to you. You will always have the ability to unsubscribe from promotional communications at any time;
- Survey your opinions through surveys and questionnaires;

4. Legal bases for processing

GDPR requires us to inform you of our legal bases for processing your personal data. Our legal bases for collecting and using your information described in Section 2 above will depend on the particular category of personal data and the specific context in which we collect it. However, below are some examples of legal bases for processing that we rely on:

- Where use of your information is necessary to perform our obligations under a contract with you (for example, to comply with the Terms and Conditions);
- Where use of your information is necessary for our legitimate interests or the legitimate interests of others (for example, to provide security, operate our products and services, prevent fraud, analyse use of and improve our products and services, and for similar purposes);
- Where use of your information is necessary to comply with a legal obligation (for example, to comply with our legal obligations to collect and store tax or invoice information for a certain period of time);
- Where we have your consent to process data in a certain way (for example, when we post your testimonials on our Website).

5. With Whom We Share The Personal Data

WingOps products and services by necessity require us to provide some of your information to third parties. We may occasionally employ other companies to perform functions on our behalf, such as:

Suppliers and service providers: We share Personal Data with suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above. These include: processing card payments, sending postal mail and email, analysing data and providing marketing assistance.

Mandatory disclosures and legal claims: We may disclose your Personal Data to government or law enforcement officials or private parties as required by law to comply with a request from our regulators, governmental request or any other legally enforceable demand. We also share Personal Data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

Business sale: We may sell, transfer or otherwise share some or all of our business or assets, which may include your personal data, in connection with a business deal such as a merger, consolidation, acquisition, reorganisation or sale of assets or in the event of bankruptcy or liquidation where your personal data may be transferred as part of such a transaction as permitted by law and/or contract. B

We need to disclose the information we collect about you to make our products and services run smoothly and to operate our business under the following conditions:

6. What Are Your Rights

Regardless of what country you're located in, we respect your data subject rights. At WingOps we implement privacy globally and we will not discriminate against you for exercising your privacy rights. Specifically, if you are in the European Economic Area and the UK you have the following rights under the GDPR and the UK GDPR:

Access. Subject to certain exceptions, you have the right to request a copy of the personal data we are processing about you, the information about categories of information we collect or disclose about you, the categories of sources of such information, the business or commercial purpose for collecting your information, and the categories of third parties to which we disclose your information.

Rectification. You have the right to require that any incomplete, inaccurate or outdated personal data that we process about you is rectified.

Deletion. You have the right to request that we delete personal data that we process about you, unless we are required to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

Restriction. You have the right to request that we restrict our processing of your personal data whilst a complaint is being investigated where:

- you believe such data to be inaccurate;
- our processing is unlawful; or
- we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.

Portability. You have the right to request that we transmit the personal data we hold in respect of you to another data controller. At your request, we'll provide you with a transferable copy of your data or send it directly (if possible) to your designated recipient. Please note this only applies where the lawful basis was either consent or performance of a contract and processing was automated.

Objection. Where the legal basis for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

Withdrawing Consent. If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us. For any processing that is based on your consent, you can withdraw that consent at any time. This means that we will stop that processing, unless there is another basis to continue processing, such as a legal obligation. Withdrawing consent does not affect any processing that has already taken place.

Right to Avoid Automated Individual Decision-Making: At WingOps, all decisions that could affect your rights are made by humans. While we use computers to help us in our work, all decisions are made by real individuals.

If you are in the EEA you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. Access a list of local data protection authorities in EEA countries [here](#).

We may have disclosed your information as described above during the preceding 12 months, but we do not sell, rent, release, disclose, disseminate, make available, transfer,

or otherwise communicate in any way your personal data to third parties in exchange for monetary or other valuable consideration.

7. How You Can Exercise Your Rights

If you wish to change, review or delete your personal data, go to your settings in the “Profile” page. There you can access or update the personal data depending on your user profile.

If you request any of these rights, we will need to verify your identity and may need to verify your relationship with WingOps for security and to prevent fraud. We may take additional steps to verify that you are authorised to make the request. If you are an end user of our customers and WingOps is a data processor with regards to that processing activity (for example, your company uses our Services and you’re an employee or authorised representative of that company), you should direct requests relating to your personal data to the administrator of your company’s WingOps account. We will redirect you to your administrator or notify the administrator directly.

There is no fee for facilitating a request unless it is manifestly unfounded or excessive, in which administrative costs can be recovered. This shall be determined on a case-by-case basis. Requests that are manifestly unfounded or excessive can be refused. If WingOps has to refuse such a request, it shall provide a reasoning for such denial, within 1 (one) month of receiving such a request, in the same format as the request was communicated to WingOps.

8. Third Party Sites and Services

Our Website may contain links to other websites which are controlled by third parties. These links are not an endorsement, authorization, or representation that we are affiliated with that third party. We do not have control over such websites and services and cannot be held accountable for their actions. Please be aware that these third party websites are governed by their own privacy policies.

9. How Does WingOps Protect Your Personal Data

We know how much data security matters to all our data subjects. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. Such measures include, but are not limited to:

- Securing access to all transactional areas of our Website using ‘https’ technology.
- Regularly monitoring our system for possible vulnerabilities and attacks, and carrying out penetration testing to identify ways to further strengthen security;
- Implementing industry-standard organisational measures and continually improving them.

How Long Does WingOps Retain Your Personal Data

We will retain your information for as long as your account is active or as needed to provide you the Service. We will retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Use By Children Under 16

We do not knowingly process any personal data from, or direct any of our Services to, children under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, they should contact us at info@wingops.aero. We will delete such personal data from our servers as soon as reasonably practicable.

Changes To Our Privacy Policy

We reserve the right to update this Privacy Policy to make sure it accurately reflects our data collection and use practices, our new features, or as applicable laws require. We will comply with applicable legal requirements regarding providing you with notice and/or consent when we make such changes, depending on the type of change made. Where it is practicable, we will notify you by email of any significant changes. However, the last update date is posted above, and we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

What if I still have questions?

We hope that this Privacy Policy can resolve any query or concern you raise about our use of your personal data. If you feel we have not handled your query or concern to your satisfaction you can contact us by sending an email to info@wingops.aero or by post to:

WingOps OÜ,

Harju county, Nõmme district, Vääna street 7-18, 11612, Tallinn, Estonia.

Cookies Notice

What are Cookies?

Cookies are small text files that are downloaded to your computer or mobile device by a website via your web browser when you visit a website or other online service. Cookies store information about how you use an online service so that the website can recognize your device, provide functionality, enhance your experience, analyse usage patterns, and personalise content and advertising. For additional information on cookies, please visit www.allaboutcookies.org

How does WingOps use cookies?

Wingops uses cookies to collect a variety of information for different purposes. Here are examples of the types of information that we collect through cookies:

- to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in the Website and used to calculate visitor, session and campaign data for the Website analytics reports;
- Number of visitors, the frequency with which the Website is used, the pages viewed, the clicks made, and the total duration of use.

Types of cookies we use

We utilise the following types of cookies:

- **Strictly necessary cookies:** These cookies are strictly necessary to provide you with certain features. For example, these cookies allow you to access secure areas that require registration and edit your account preferences. Because these cookies are essential to providing services to you, they cannot be disabled.
- **Performance Cookies (also commonly known as Analytics Cookies):** These cookies allow us or our third-party analytics providers to collect information and statistics on use of our Services by you and other visitors. This information helps us to improve our Services for the benefit of you and others.

Cookie Key	Domain	Cookie Type	Expiration	Description
ar_debug	.region1.google-analytics.com	Third-party – Analytics (Google Analytics / Google Ads Debugging)	Session	Used by Google services for debugging and verifying analytics or advertising integration. Helps diagnose tracking behavior during analytics or tag configuration.
datr	.facebook.com	Third-party – Marketing / Security (Meta)	~2 years	Identifies the browser for security and fraud prevention purposes, helping Meta detect suspicious login activity and protect users.

sb	.facebook.com	Third-party – Marketing / Security (Meta)	~2 years	Helps Meta identify browsers and improve site security and authentication processes.
c_user	.facebook.com	Third-party – Social / Authentication (Meta)	Session / up to 1 year	Contains the Facebook user ID of the currently logged-in user, enabling integration with Facebook services such as social plugins or tracking.
ar_debug	.facebook.com	Third-party – Marketing / Debugging (Meta)	Session	Used by Meta for debugging ad pixel or analytics integrations.
dpr	.facebook.com	Third-party – Functional / Social (Meta)	~7 days	Stores device pixel ratio to optimize display of Facebook content and embedded widgets.
fr	.facebook.com	Third-party – Marketing / Advertising (Meta Pixel)	~3 months	Used by Meta to deliver, measure, and improve targeted advertisements and track conversions across websites.
xs	.facebook.com	Third-party – Authentication / Security (Meta)	Session	Contains session and authentication information for Facebook login and security validation.

How can I control cookies on my browser?

You can also configure your browser at any time to be notified of the receipt of a cookie, so that you can decide whether you want to accept it or not. As the means by which you can refuse cookies through your web browser controls vary from browser to browser, you should visit your browser's help menu for more information. The following is information about how to manage cookies on the most popular browsers:

- [Chrome](#)
- [Internet Explorer](#)
- [Firefox](#)
- [Safari](#)
- [Edge](#)

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enables us to recognize when someone has visited our Website. This allows us, for example, to monitor the traffic patterns of users from one page within a Website, to deliver or communicate with cookies, to understand whether you have come to the Website from an online advertisement displayed on a third-party website, to improve Website performance, and to measure the success of our current/future marketing campaigns.

Changes to this Notice

We may update this notice as necessary to account for changes in our practices or legal requirements. Please revisit this notice regularly to stay informed about our use of cookies.

Contact us

If you have any additional questions about how we use cookies, you can contact us at info@wingops.aero.