

CAMINO AERO PRIVACY POLICY

27 March 2017

At Flight Time Aviation Group Inc. ("Camimo Aero," "CaminoAero.com," "we," "us," "our") know that our users ("you," "your", "subscribers") care about how your personal information is used and shared, and we take your privacy seriously. This privacy policy describes how Flight Time Aviation Group Inc. collects and uses the personal information you provide on our Website: CaminoAero.com. Please read the following to learn more about our Privacy Policy. By visiting or using the Website or Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy and you hereby consent that we will collect, use, and share your information in the following ways. Any capitalized terms used herein without definition shall have the meaning given to them in the Camino Aero Terms of Service document.

Flight Time Aviation Group Inc. complies with the EU-U.S. Privacy Shield 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. Please refer to Addendum 1.1 of this policy for more information regarding Flight Time Aviation Group Inc.'s EU Privacy Shield Certification Information.

What does this privacy policy cover?

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Website or Services. This policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Services, as that term is defined in our Terms of Service. No one under age 13 may provide any personal information to us or on the Services.

What information does Camino Aero collect?

We gather various types of Personal Information from our users, as explained more fully below. We may use this Personal Information to personalize and improve the Services, to allow our users to set up a user account and profile, to contact users, to fulfill your requests for the Services, to analyze how users utilize the Website, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties (described in this Section and in Section C below). We collect the following types of information:

A. Information You Provide to Us:

Your Personal Information: We receive and store any information you knowingly provide to us. For example, we collect Personal Information such as your name, email address, and browser information. You can choose not to provide us with certain information such as your credit card information, but then you may not be able to register with us or to take advantage of some of our features. We may anonymize your Personal Information so that you cannot be individually identified, and provide that information to our partners.

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the site. CaminoAero.com stores this information for the sole purpose of sending this one-time email, and tracking the success of our referral program.

Your friend may contact us at fly@caminoaero.com to request that we remove this information from our database.

B. Information Collected Automatically:

Whenever you interact with our Website, we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested. "Cookies" are identifiers we transfer to your computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our Website are visited by you. You may be able to change the preferences on your browser or mobile device to prevent or limit your computer or device's acceptance of cookies, but this may prevent you from taking advantage of some of our Website's features. If you click on a link to a third party website, such third party may also transmit cookies to you.

When you visit the Website, whether as a Camion Aero customer or a non-registered user just browsing, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). For example, Log Data may include information such as your computer's IP address, browser type or the webpage you were visiting before you came to our Website, pages of our Website that you visit, the time spent on those pages, information you search for on our Website, access times and dates, and other statistics. We use this information to monitor and analyze use of the Website and the Services and for the Website's technical administration, to increase our Website's functionality and user-friendliness, and to better tailor it to our visitors' needs.

Technologies such as cookies, beacons, scripts and tags are used by Flight Time Aviation Group Inc. and our third party partners. These technologies are used in analyzing trends, administering the website, tracking users' movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. Various browsers may offer their own management tools for removing these types of tracking technologies.

We use Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5, to store content information and preferences. Various browsers may offer their own management tools for removing HTML5. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use Flash cookies to collect and store information.

Our third party partners also employ clear gifs (a.k.a. Web Beacons / Web Bugs), images, and scripts that help them better manage content on our site. We do [not] tie the information gathered to our Customers' or Users' personal information.

We partner with a third party ad network to either display advertising on our Website or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personally identifiable information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt out of cookies [here](#) (or if located in the

European Union, opt out [here](#)). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

Our website includes Social Media Features, such as the Facebook Like button, and Widgets, such as the Share this button or interactive mini-programs that run on our website. These Features may collect your Internet protocol address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy statement of the company providing it.

C. E-mail and Other Communications:

We may contact you, by email or other means; for example, we may communicate with you about your use of the Website or Services. If you do not want to receive email or other mail from us, please indicate your preference by adjusting the settings on your account screen in the Website. Please note that if you do not want to receive legal notices from us, those legal notices will still govern your use of the Website, and you are responsible for reviewing such legal notices for changes.

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at fly@caminoaero.com

Where do we store your personal information?

If you are located outside the United States, the information that we collect from you may be transferred to, and stored and processed at, a destination in the United States. By submitting information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

Will Camino Aero share any of the personal information it receives?

We neither rent nor sell your Personal Information in personally identifiable form to anyone. We share such Personal Information in personally identifiable form with third parties as described below.

A. Trusted Third Parties:

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide the Services to you. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. This includes third party companies and individuals employed by us to facilitate our Services, including the provision of maintenance services, database management, Web analytics and general improvement of the Services.

B. Business Transfers:

We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that is transferred. Also, if we (or substantially all of our assets)

are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information would be one of the assets transferred to or acquired by a third party. You will be notified via email and / or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

C. Protection of Camino Aero and Others:

We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with law or a court order; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of Flight Time Aviation Group Inc., our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. We also may be required to disclose an individual's Personal Information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

D. With Your Consent:

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

Is the personal information secure?

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but we cannot guarantee complete security. The transmission of information via the Internet is not completely secure. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

When you enter your information on our site we encrypt the transmission of that information using transport layer security (TLS).

The Website may contain links to other sites. We are not responsible for the privacy policies and / or practices on other sites. When following a link to another site you should read that site's privacy policy.

What personal information can I access?

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password
- email address
- profile photo
- company name
- position in company
- location

- credit card information

The information you can view, update, and delete may change as the Website changes. If you have any questions about viewing or updating information we have on file about you, please contact us at fly@caminoaero.com. We will respond to your request to access within 30 days. Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and / or third parties for marketing purposes, and providing contact information for such affiliates and / or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: fly@caminoaero.com.

Testimonials

We post customer testimonials / comments / reviews on our web site which may contain personally identifiable information. We do obtain the customer's consent via email prior to posting the testimonial to post their name along with their testimonial. To request removal of your personal information from Testimonials or comments please contact us at fly@caminoaero.com.

What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our special features. You may be able to add, update, or delete information as explained in Section C above. When you update information, however, we may maintain a copy of the unrevised information in our records. We will retain your information for as long as your account is active or as needed to provide you services. You may request deletion of your account by contacting us at fly@caminoaero.com. Please note that some information may remain in our private records after your deletion of such information from your account. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements but barring legal requirements, we will delete your information within 90 days. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

To request removal of your Personal Information from our blog or community forum, contact us at fly@caminoaero.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Changes to this privacy policy

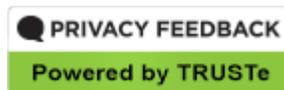
We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on our Website or sending you an email prior to the change becoming effective. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted.

Questions or concerns

If you have any questions or concerns regarding our privacy policies, please send us a detailed message fly@caminoaero.com. We will make every effort to resolve your concerns.

Effective Date: 25 March 2017

If you have questions or complaints regarding our privacy policy or practices, please contact us at fly@caminoaero.com. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge).



Addendum – 1.1 Camino Aero EU Privacy Shield Certification Information

EU-US Privacy Shield Certification

The following information aligns Flight Time Aviation Group Inc. Privacy Statement with the specific points required by the Privacy Shield self-certification process, and ensures Flight Time Aviation Group Inc.'s compliance with the EU-US Privacy Shield Framework.

Flight Time Aviation Group Inc. complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Flight Time Aviation Group Inc. has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, visit privacyshield.gov.

In compliance with the EU-US Privacy Shield Principles, Flight Time Aviation Group Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact the Flight Time Aviation Group Inc. compliance team at:

fly@caminoaero.com

Flight Time Aviation Group Inc. has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and 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, please visit bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

Flight Time Aviation Group Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

US-Swiss Safe Harbor

Flight Time Aviation Group Inc. complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. Flight Time Aviation Group Inc. has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit export.gov/safeharbor/swiss.

In compliance with the US-Swiss Safe Harbor Principles, Flight Time Aviation Group Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss citizens with inquiries or complaints regarding this privacy policy should first contact Flight Time Aviation Group Inc. at:

fly@caminoaero.com

Flight Time Aviation Group Inc. has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism 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, please visit bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

Organization Contact

Flight Time Aviation Group Inc. handling of complaints, access requests, and any other issues concerning Flight Time Aviation Group Inc.'s compliance with the EU-US Privacy Shield Framework:

fly@caminoaero.com

Organization Corporate Officer

Certifying Flight Time Aviation Group Inc. compliance with the Privacy Shield Framework:

By submitting this self-certification, the below listed corporate officer attests that he / she is authorized to submit the self-certification on behalf of your organization and all entities or subsidiaries indicated below.

fly@caminoaero.com

Types of information covered by Camino Aero's Privacy Policy

Human Resources Data refers to personal data about employees, past or present, collected in the context of the employment relationship. Information other than Human Resources data includes the following: customer, client, visitor, and clinical trial data.

Flight Time Aviation Group Inc.'s Privacy Policy covers: Personal data other than human resources data.

Purposes for which Flight Time Aviation Group Inc. collects and processes personal data in reliance on the Privacy Shield

Please refer to Section “What information does CaminoAero.com collect?” of this Privacy Policy.

In particular, and regarding the disclosure of your Personal Data, please refer to Section “Will Camino Aero share any of the personal information it receives?” of this Privacy Policy.

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, Flight Time Aviation Group Inc. is potentially liable.

User’s right to access their data

Flight Time Aviation Group Inc. acknowledges that EU individuals have the right to access the personal information that we maintain about them. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct his query to fly@caminoaero.com. If requested to remove data, we will respond within a reasonable timeframe.

Please refer to Section “What personal information can I access?” to find out about how to access, correct or delete your Personal Data.

Please refer to Section “What choices do I have?” to find out about the choices and means available to you to limit use and disclosure of your Personal Data.

Location of Flight Time Aviation Group Inc.’s privacy policy applicable to personal data covered under Flight Time Aviation Group Inc.’s self-certification:

- Effective Date: March 24, 2017
- Camino Aero Privacy Policy
- EU Privacy Shield Addendum

Federal Trade Commission will serve as the statutory body and has jurisdiction to investigate claims against Flight Time Aviation Group Inc. regarding possible unfair or deceptive practices and violations of laws or regulations covering privacy.