

Website Data Privacy Policy

Effective Date: July 1, 2026

Evans Family Office, and its worldwide subsidiaries, including Universal Aviation® entities and Air Culinaire Worldwide, (“EFO”, also referred to as “we”, “us”, “our”) are providing this privacy policy to inform you (“you” refers to any entity or person who is not a EFO employee) regarding our collection, use, disclosure, and storage of data about you that we collect via our websites, mobile applications and social media (collectively “Website”). Our primary goals in collecting data are to contact companies and individuals who have indicated an interest in EFO, and to enable effective use of an informative EFO Website.

DATA WE COLLECT

We collect personal data from you directly and from third parties. We collect personal data directly from you when you fill out any online account applications and promotion entries, event registrations, and other registrations and web forms, or otherwise when you communicate with us for online webforms or via email.

In some cases, we may also collect certain personal data from third parties such as Google Analytics, LinkedIn, Hubspot, Facebook, Instagram, Pantheon, YouTube, and Doubleclick.

We also collect personal data when you visit or use our websites, mobile application and products or services.

The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and with our Website. We collect personal data about you from the following different sources:

- **Information that you provide directly**

We collect personal data directly from you when you choose to provide us with this information online. Certain parts of our Website ask you to provide personal data when you create an account for communication subscriptions.

- **Information that we collect indirectly**

We collect your personal data indirectly, including through automated means from your device when you use our Website. Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the "Cookies and similar tracking technology."

- **Information from third parties**

We also collect your personal data from third party sources, i.e. our service providers that provide email, marketing and analytics services.

The table below describes the categories of personal data we collect from and about you through our online services and activities on our Website and when you visit our premises. We will combine this information with other information contained in our systems.

Personal Data Description	Source
Identity and Contact Data such as your name, email address and telephone number and delivery address.	• Directly from you (online or offline) • Third parties • Automatic Collection
Account Data such as your login information (email and password) and profile information (contact details including your name, surname, postcode, phone, job title, aircraft information, flight/travel details and service preferences.	• Directly from you • Third parties
Communications Data such as your feedback on the performance of our Website and other communications with us (including when you interact with our customer service agents offline), any queries you raise, competition and survey entries, chat, email or call history on the Website or with third party service providers. This will include information as to how you contact customer services and the channel of communication that you use or any information that you send to us (for example, if you complain about the performance of our Website and send us screenshots).	• Directly from you • Third parties • Automatic collection
Advertising and Marketing Data such as your interests based on your use of our Website and other websites and online services, your purchases, survey responses, promotions you	• Directly from you • Third parties

enter, preferences in relation to receiving marketing materials from us, communication preferences, your preferences for particular products or services and your subscription details.	• Automatic collection
Device Data collected using tags and pixels, including your IP address, your ISP, and the browser you use to visit our Website, device type, unique device identification numbers or other identifiers including advertising identifiers.	• Automatic collection
Website Usage Data such as activity and Website page interaction, information that we capture using cookies and similar technologies (see the "Cookies and similar tracking technology" section below). This will include page views and searches, log-in information, clicks, operating system, information about content viewed, watched or downloaded for offline access, length of visits to certain pages, length of Website use, purchase history and other functional information on Website performance (for example, application version information, diagnostics, and crash logs).	• Automatic collection

USE OF YOUR DATA AND LEGAL BASIS FOR PROCESSING

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data in order to provide the goods and support the services you purchase or request from us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case

you can voluntarily choose to give or deny your consent without any negative consequences to you;

- **Legitimate interests** – we will use or disclose your personal data for the legitimate business interests of either EFO or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our Website; communicate with you and respond to your questions; improve our Website or use the insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors and visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are. To obtain information from the associated balancing test please contact us using the contact details provided under the “How to contact us” heading below; or
- **Legal obligation** – there be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
Register your account on our Website, to manage and administer your account.	Identity and Contact Data Account Data Communication Data	• Performance of a contract with you.

	Device Data	• Legitimate interests
Respond to your communications regarding our products and services.	Identity and Contact Data Account Data Communication Data Device Data Website Usage Data	• Performance of a contract with you. • Otherwise, as necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.
Keep our business, including our Website and our employees, customers, vendors, and visitors secure and address threats to your safety or the safety of others; to detect and prevent fraud. For example, online we use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect unauthorized access.	Identity and Contact Data Account Data Device Data Website Usage Data Communication Data	• Necessary for our and our third parties' legitimate interests (to operate and provide our business, including our Website; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure).

Manage compliance with our terms of service, manage our compliance hotline and related reporting.	Identity and Contact Data Account Data Communication Data Social media	• Performance of a contract with you. • Otherwise, as necessary for our legitimate interests (to operate, provide and improve our business, including our Website; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, and visitors. • Legal obligations such as the Foreign Corrupt Practices Act and the California Privacy Rights Act.
To administer and maintain our Website and our IT	Identity and Contact Data Account Data	• Our and our third parties' legitimate

systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data).	Device Data Website Usage Data	interests (to operate, provide and improve our business, including our Website; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure).
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyze collected data to learn about our Website, to improve our Website, and to develop new products and services. This includes our Website analytics, identifying browsing / purchasing trends and patterns and evaluating this information on an aggregated, group(s) basis (Social media, Marketing Data) and individual basis (Account Data, Device Data, and Website Usage Data).	Account Data Device Data Website Usage Data Social media Account Data Advertising and Marketing Data Communications Data	• Consent (where required under applicable law – see cookie consent tool on our website). • Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business, including our Website, to improve our Website or use the insights to improve or develop marketing activities and promote our

		products and services.
Analyze data including metrics related to consumer transactions and behavior (online and offline), to assess trends and the effectiveness of our advertising and marketing campaigns, to help us understand your needs and provide you with better service and offers, to drive customer engagement, promote our brand, and inform other business decisions by understanding consumer behavior.	Account Data Device Data Website Usage Data Social media Communication Data Marketing Data	• Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business, including our Website, to improve our Website or use the insights to improve or develop marketing activities and promote our products and services).
Contact current and prospective customers (including Website visitors) about our products and services, promotions, competitions and events we think may be of interest, including our newsletter and other promotional mailers and electronic communications.	Account Data Website Usage Data Marketing Data Communication Data Social media	• Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business; to communicate with you and to develop marketing activities

		and promote our products and services).
Personalize and customize your experience, including to provide local or otherwise targeted content and information for customers, and to tailor the content and advertising served on our Website.	Account Data Marketing Data Website Usage Data Device Data Social media	• Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business, including our Website, to use the insights to improve or develop marketing activities and promote our products and services).
Personalize, target, and deliver advertising for our products and services on third party websites, apps, and other online services (Including to identify audiences and individuals like you to better tailor our marketing campaigns and communications), and measure the effectiveness of our campaigns and adjust our methods.	Account Data Marketing Data Website Usage Data Social media Contact Device Data	• Consent (where required under applicable law). • Otherwise, our legitimate interests (to improve our business, to promote our products and services and to use the insights to

		improve or develop our marketing activities).
Analyze social media performance metrics to evaluate and execute social media campaigns, including interacting with our current and prospective customers on various social media channels to promote our products, run contests and promotions, answer questions and otherwise drive and monitor customer engagement and satisfaction.	Account Data Marketing Data Social media Communication Data Website Usage Data Device Data	• Consent (where required under applicable law). • Otherwise, our legitimate interests (to improve our business, to promote our products and services and to use the insights to improve or develop marketing activities).
Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law.	Identity and Contact Data Account Data Website Usage Data Communication Data	• Legal obligation including the EU GDPR, CPRA and OFAC's Sanctioned Countries List.
Protect our legal rights (including where necessary, to share information with law enforcement and others), for example to	Identity and Contact Data Account Data Website Usage Data Communication Data	• Our legitimate interests to protect our business interests.

defend claims against us and to conduct litigation to defend our interests.		
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DISCLOSURE OF YOUR DATA

We do not sell your personal data to any third parties. We share your personal data with the following categories of recipients:

- our group companies**, who provide data processing services necessary to provide you with our goods and services (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal data for purposes described in this Privacy Notice.
- third party service providers and partners** who provide data processing services to us as necessary to provide you with our goods and/or services (to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal data for purposes described in this Privacy Notice. The following table lists the main third party service providers we engage to process your personal data, the categories of services they provide, and the types of personal data they receive in order to provide us these services;

Service Provider	Services	Personal data
Google/Alphabet	Behavioral Advertising and Paid Marketing	IP address.
Hubspot	Email Marketing	Name, email, phone, business address, birth month and day, email opt in and subsequent email opt out. Conversation history.
LinkedIn, Facebook and Instagram	Social Media Campaigns and Contest Promotions	Social media contact details

YouTube and Vimeo	Video functionality	IP address
Salesforce	Customer Relationship Management (CRM), Sales Pipeline Management, and Customer Data Integration	Name, email, phone, business address, birth month and day, email opt in and subsequent email opt out. Conversation history.
Klaviyo	Email Marketing	Name, email, phone, business address, birth month and day, email opt in and subsequent email opt out.

- **Third party services** when you use third party services linked through our Website, for example, third party payment services, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services;
- Any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- A **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- Any **other person with your consent** to the disclosure (obtained separately from any contract between us).

We require such third parties to take reasonable security measures to protect your personal data, and third parties are instructed not to use your data other than for the purpose for which it was made available to them. Where we act as the data controller of your personal data, we remain liable for protection of your personal data in case of any onward transfer our third-party data processors, subject to any terms in our contract with you.

COOKIES AND SIMILAR TRACKING TECHNOLOGIES

EFO uses “cookies” to obtain certain types of data when your web browser accesses our website. Cookies are alphanumeric identifiers that we transfer to your computer’s hard drive through your web browser to enable our system to recognize your browser, to provide various types of functionality, to better understand how you interact with our website, to monitor aggregate usage, and to optimize web traffic routing on our website. The “help” portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Certain areas or features of the website may not be available or fully-functional if you choose to disable cookies.

See EFO’s Cookie Declarations below for information on the cookies we use:

ACW Network: <https://www.acwnetwork.com/cookie-declaration>

Link Culinaire ACW: <https://www.linkculinaireacw.com/cookie-declaration/>

Air Culinaire Worldwide: <https://www.airculinaireworldwide.com/cookie-declaration/>

GAT-SJO: <https://gat-sjo.com/cookie-declaration>

Evans Family Office: <https://evans.aero/cookie-declaration/>

Universal Aviation: <https://www.universalaviation.aero/cookie-declaration/>

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 enable us to recognize when someone has visited our Website. This allows us, for example, to determine whether an email has been viewed by a user, monitor the traffic patterns of users from one page within our Website to another, to deliver or communicate with cookies, to understand whether you have come to our Website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will often impair their functioning.

You have the right to decide whether to accept or reject cookies that are not essential. You can exercise your cookie preferences through the cookie banner or the respective cookie declaration page listed above.

DATA CONTROLLER AND DATA PROCESSOR

When we use your data for our own purposes, we act as the data controller, as that term is used in applicable privacy laws, for any personal data that we collect from you. When we collect data from or on behalf of our customers (e.g., charter aircraft operators, corporate aviation departments), those customers are the data controllers, and we are the data processor. If we are acting as the data processor, we will only process the relevant data in accordance with instructions from the data controller.

DATA RETENTION, ACCESS, CORRECTION, DELETION AND PORTABILITY

We retain the personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). In some cases, we will retain the data for a longer period as

necessary to comply with our legal obligations, follow records retention policies, resolve disputes, and enforce our agreements. The specific retention periods depend on the nature of the information and why it is collected and processed and the nature of the legal requirement.

When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

You may request access, correction, erasure or portability of your personal data that we process. We will grant such request except where an exception under the law would make it inappropriate to comply with all or some of the request to request access to, correction of, or erasure of your personal data, please contact us as set forth at the end of this privacy policy. In cases where we are not the data controller (such as when the personal data was collected from or on behalf of a charter aircraft operator, corporate aviation department or other customer), we may need to refer you or your request to the applicable data controller.

SECURITY

EFO is very concerned with safeguarding your personal data. The integrity and availability of your personal data are critical to the provision of superior products and services to you. We employ appropriate technical, organizational, administrative, physical, procedural, and technological measures designed to protect your data from unauthorized access or alteration and loss or misuse.

We have implemented a multi-layered approach to protect electronic information through a comprehensive Information Technology (IT) Security program. Our IT Security program is designed to safeguard electronic information by proactively providing leadership and support for areas related to network security, system security, risk assessment, remediation tracking, and adherence to security compliance mandates. EFO employees work as a team so that information is protected against unintentional disclosure and are guided by compliance objectives, standard operating procedures, and acceptable usage policies.

EUROPEAN AND SWISS RESIDENTS

Evans Family Office , Evans Global Aviation, LLC, Air Culinaire Worldwide, LLC, and Air2Ground Concierge, LLC, (collectively, the “EFO Entities”) are based in the United States, and personal data collected by the EFO Entities worldwide (including within the UK, EU and Switzerland) may be transferred to the United States, India our Universal Aviation® locations which can be found at www.universalaviation.aero/locations/, or one of our Air Culinaire Worldwide® locations which can be found at <https://www.airculinaireworldwide.com/locations/>. By using the EFO Entities’ services or submitting personal data to the EFO Entities, you consent to the transmission of your information outside your own country.

The EFO Entities rely upon Article 46(2)(d) (the Standard Contractual Clauses) or Article 49(1)(b) (necessity for the performance of a contract) as the legal basis for the transfer of personal data to a third country.

We have taken appropriate safeguards to ensure that your personal data will remain protected in accordance with this policy and applicable laws. The safeguards we use to transfer personal data

are in case of both our group companies and third-party service providers and partners, the European Commission's Standard Contractual Clauses as issued on 4 June 2021 under Article 46(2) using controller to controller and controller to processor transfers, including the UK Addendum for the transfer of data originating in the UK.

You have the right to lodge an inquiry or complaint with a supervisory authority in your member country.

CALIFORNIA PRIVACY RIGHTS

We do not sell your personal information to third parties. California law entitles California residents to certain additional protections regarding personal information. For purposes of this section alone, "personal information" means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. California residents have the right to request:

- information regarding your personal information we have collected in the past 12 months (including the categories of personal information we have collected, the categories of sources of such information, and the purposes for which we have collected such information);
- notice of whether we have disclosed your personal information to third parties in the past 12 months (and if so, what categories of information we have disclosed, and what categories of third parties we have disclosed it to);
- a copy of your personal information collected by us in the past 12 months; and
- that your personal information be deleted.

We will not discriminate against you if you choose to exercise any of these rights. To make any of the above requests, please contact us as set forth at the end of this policy. We may require verification of your identity before further processing your request. In certain instances, we may be permitted by law to decline some or all of such requests.

TRANSFER OF BUSINESS

In the event of a merger, consolidation, sale, or transfer of all or substantially all of the assets or business of EFO, one of the assets which would generally be transferred is the data we have collected. We will advise a successor or successors in interest of the terms of this privacy policy and our expectation that the successor(s) in interest will adopt and maintain this policy until there is a notification of an amendment of this policy.

CHILDREN

EFO's website is not directed toward children under 18. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us as set forth at the end of this privacy policy and we will take reasonable steps to remove such data from our systems.

PRIVACY POLICY CHANGES

EFO and its successor(s) in interest reserve the right to and may revise this privacy policy from time to time in response to changing legal, regulatory, technical or business developments.

If we make a material change to this policy, we will post the updated privacy policy (with the date of change(s) noted in the policy) on the EFO homepage and other places we may deem appropriate, so that you are aware of what data we collect, how we use it, and under what circumstances, if any, we disclose it.

CONTACT

Evans Global Aviation, LLC Attn: Legal Department and Data Protection Officer
1150 Gemini Street, Suite 200
Houston, Texas 77058
United States

Phone (North America): +1 (800) 793-1295

Phone (Other): +1 (713)-947-5576

Email: dataprivacy@universalaviation.aero