



# HEVEN AEROTECH PRIVACY POLICY

*Effective Date: May 13, 2026*

*Last Updated: May 13, 2026*

## 1. Introduction

Heven Aerotech, Inc. ("**Company**," "**we**," "**us**," or "**our**"), a Virginia based corporation is committed to protecting the privacy of individuals who visit our website at [www.hevenaerotech.com](http://www.hevenaerotech.com) and its associated subdomains (collectively, the "**Site**"). This Privacy Policy explains what information we collect, how we use it, how we protect it, and your rights with respect to that information.

By accessing or using our Site, you acknowledge that you have read, understood, and agree to this Privacy Policy and Terms of Service.

## 2. Applicable Laws and Regulatory Framework

This Privacy Policy is governed by Virginia Law and is designed to comply with all applicable United States Federal and State privacy laws as well as any applicable international privacy laws as of the Effective Date of this Policy, including but not limited to:

### Federal Laws

- Federal Trade Commission Act (15 U.S.C. § 45) — prohibits unfair or deceptive acts or practices, including deceptive privacy policies.
- Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2510–2523 — governs interception of electronic communications.
- Computer Fraud and Abuse Act (CFAA), 18 U.S.C. § 1030 — protects against unauthorized access to computer systems.
- CAN-SPAM Act, 15 U.S.C. §§ 7701–7713 — governs commercial email communications.

### State Laws

- California Online Privacy Protection Act ("CalOPPA"), Cal. Bus. & Prof. Code §§ 22575–22579.
- Virginia breach notification law (Va. Code Ann. § 18.2-186.6)

### International Laws

- General Data Protection Regulation ("GDPR"), (EU) 2016/679, art. 6(1).

This Privacy Policy will be reviewed annually and updated to reflect any additional federal, state, or international laws that may become applicable to our services.



### **3. Information We Collect**

#### **3.1 Information You Provide Directly**

We may collect the following categories of personal information when you voluntarily provide it to us through forms or communications:

- Name, email address, phone number, and postal address
- Communications and correspondence you send to us
- Any other information you choose to provide

#### **3.2 Information Collected Automatically**

When you visit our Site, we may automatically collect:

- IP address and approximate geographic location
- Browser type, operating system, and device identifiers
- Pages visited, time spent on pages, referring URLs, and clickstream data
- Cookies, web beacons, pixels, and similar tracking technologies
- Log files and session data

#### **3.3 Information From Third Parties**

We may receive information about you from third-party sources such as social media platforms and analytics providers.

### **4. How We Use Your Information**

We use the information we collect for the following purposes:

- To provide, operate, and maintain our Site and services
- To send related communications
- To respond to inquiries, customer service requests, and support needs
- To send promotional communications, newsletters, and marketing materials (where you have consented or we have a legitimate interest and applicable law permits)
- To comply with the CAN-SPAM Act requirements for commercial emails
- To analyze usage and improve the performance, functionality, and user experience of our Site
- To detect, prevent, and investigate fraud, security breaches, and other illegal activity
- To comply with all applicable legal obligations and respond to lawful government or regulatory requests
- To enforce our Terms of Use and other agreements
- For any other purpose with your consent

### **5. Legal Bases for Processing**

Where required by applicable law, we rely on one or more of the following legal bases to process your personal data:



- Your consent, which you may withdraw at any time
- Performance of a contract to which you are a party
- Our legitimate business interests, provided they do not override your rights
- Compliance with a legal obligation

## 6. Cookies and Tracking Technologies

Our Site uses cookies and similar technologies to enhance your experience and analyze traffic. Cookies are small text files stored on your device.

You may control cookies through your browser settings or, where available, through our cookie consent tool. Please note that disabling certain cookies may affect Site functionality. We use the following types of cookies:

- Essential Cookies — necessary for the Site to function and cannot be disabled.
- Performance/Analytics Cookies — collect information about how visitors use the Site (e.g., Google Analytics).
- Functionality Cookies — remember your preferences and settings.

## 7. How We Share and Disclose Your Information

We do not sell your personal information to third parties. We may share your information in the following circumstances:

- Service Providers — with vendors and contractors who assist in operating our Site and business (e.g., hosting, email delivery, analytics), under confidentiality obligations.
- Business Transfers — in connection with a merger, acquisition, reorganization, or sale of assets, your information may be transferred as a business asset.
- Legal Compliance — when required by law, subpoena, court order, or governmental authority, or to protect our rights and the safety of others.
- With Your Consent — to any third party where you have given explicit consent.
- Aggregated/De-identified Data — we may share aggregated or de-identified data that cannot reasonably identify you.

## 8. General Data Protection Regulation (GDPR) Compliance

This Section applies to individuals located in the European Economic Area (EEA), the United Kingdom (UK), and Switzerland (collectively, "**EU/EEA Residents**"). If you access our Site from outside the United States, please read this Section carefully alongside the rest of this Privacy Policy.

### 8.1 Overview of the GDPR

The General Data Protection Regulation (EU) 2016/679 ("**GDPR**") is a comprehensive data protection law that took effect on May 25, 2018. It governs how organizations collect, process, store, and transfer the personal data of individuals located in the EEA, regardless of where the organization itself is based. Equivalent protections apply in the UK under the UK GDPR (as



retained in UK law by the Data Protection Act 2018) and in Switzerland under the revised Federal Act on Data Protection (revFADP).

Although we are a U.S.-based company, to the extent that we collect or process personal data of EU/EEA Residents, we are committed to complying with GDPR requirements. We have adopted GDPR-aligned data protection standards as a baseline across our global operations, reflecting our belief that strong privacy protections should apply to all individuals regardless of location.

## 8.2 What Constitutes Personal Data Under the GDPR

Under the GDPR, "**personal data**" means any information relating to an identified or identifiable natural person (a "**data subject**"). This is an intentionally broad definition and includes data that, alone or in combination with other information, can be used to identify an individual.

Examples include:

- Identifiers: name, email address, phone number, postal address, online username
- Device and network data: IP addresses, cookie identifiers, device IDs
- Financial data: bank account details, payment card information
- Special categories of sensitive data: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, and data concerning a person's sex life or sexual orientation

Special category data receives heightened protection under the GDPR and is only processed where a specific legal basis exists (e.g., explicit consent or a substantial public interest).

## 8.3 Data Protection Principles

Where we process personal data of EU/EEA Residents, we adhere to the following core principles established by Article 5 of the GDPR:

- Lawfulness, Fairness, and Transparency — Personal data is processed on a valid legal basis, in a manner that is fair and not misleading, and in ways that individuals would reasonably expect.
- Purpose Limitation — Personal data is collected for specified, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes.
- Data Minimization — We collect only personal data that is adequate, relevant, and necessary for the stated purpose.
- Accuracy — We take reasonable steps to ensure that personal data is accurate and kept up to date, and we delete or correct inaccurate data without delay.
- Storage Limitation — Personal data is retained only for as long as necessary to fulfill the purpose for which it was collected, subject to any applicable legal retention obligations.
- Integrity and Confidentiality — Personal data is processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.
- Accountability — We take responsibility for complying with these principles and can demonstrate our compliance upon request.



## 8.4 Legal Bases for Processing

We process the personal data of EU/EEA Residents only when we have a valid legal basis under Article 6 of the GDPR. Depending on the processing activity, we may rely on one or more of the following:

- Consent (Art. 6(1)(a)) — You have given clear, freely given, specific, and informed consent to the processing of your personal data for one or more specific purposes. You may withdraw consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.
- Contract Performance (Art. 6(1)(b)) — Processing is necessary to perform a contract to which you are a party, or to take steps at your request prior to entering into a contract.
- Legal Obligation (Art. 6(1)(c)) — Processing is necessary to comply with a legal obligation to which we are subject.
- Legitimate Interests (Art. 6(1)(f)) — Processing is necessary for our legitimate business interests or those of a third party, provided those interests are not overridden by your rights and interests.

## 8.5 Your Rights as a Data Subject

If you are an EU/EEA Resident, the GDPR grants you the following rights with respect to your personal data. You may exercise these rights by contacting us using the information in Section 14:

- Right of Access (Art. 15) — The right to obtain confirmation as to whether we process your personal data and, if so, to receive a copy of that data along with information about how it is processed.
- Right to Rectification (Art. 16) — The right to request correction of inaccurate or incomplete personal data.
- Right to Erasure / 'Right to be Forgotten' (Art. 17) — The right to request deletion of your personal data where it is no longer necessary for the purpose it was collected, or where you have withdrawn consent, among other grounds.
- Right to Restriction of Processing (Art. 18) — The right to request that we limit processing of your personal data in certain circumstances (e.g., while accuracy is contested).
- Right to Data Portability (Art. 20) — The right to receive your personal data in a structured, commonly used, machine-readable format and to transmit it to another controller where technically feasible.
- Right to Object (Art. 21) — The right to object to processing based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will cease such processing immediately.
- Rights Related to Automated Decision-Making (Art. 22) — The right not to be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects.

We will respond to verified requests within 30 days. In complex cases, we may extend this period by up to two additional months, with prior notice. We do not charge a fee for reasonable requests, though we may charge a reasonable administrative fee for manifestly unfounded or excessive requests.



## 8.6 International Data Transfers

Our servers and primary operations are located in the United States. If you are located in the EEA, UK, or Switzerland, your personal data will be transferred to and processed in the United States, which the European Commission has not recognized as providing an equivalent level of data protection to the EEA.

Where such transfers occur, we implement appropriate safeguards as required by Chapter V of the GDPR, which may include:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- An adequacy decision by the European Commission, where applicable
- Binding Corporate Rules, where applicable
- Other lawful transfer mechanisms recognized under applicable law

You may request a copy of the applicable transfer safeguards by contacting us at the address in Section 14.

## 8.7 Data Retention

We retain personal data of EU/EEA Residents only for as long as necessary to fulfill the purposes described in this Privacy Policy, or as required by applicable law. Where we process data based on consent, we retain it until consent is withdrawn, or the purpose is fulfilled, whichever comes first. Upon fulfillment of the Purpose or withdraw of consent, we will delete or anonymize your personal data within 60 days, unless a longer retention period is required by law.

## 8.8 Lodging a Complaint

If you believe we have processed your personal data in violation of the GDPR, you have the right to lodge a complaint with the supervisory authority in your country of residence, place of work, or the location of the alleged infringement. A list of EEA supervisory authorities is available at <https://edpb.europa.eu>. UK residents may contact the Information Commissioner's Office (ICO) at <https://ico.org.uk>.

We encourage you to contact us first so we may attempt to resolve your concern directly.

## 9. California Online Privacy Protection Act (CalOPPA)

This Section applies to California residents and is provided in compliance with the California Online Privacy Protection Act, Cal. Bus. & Prof. Code §§ 22575–22579 ("**CalOPPA**"). CalOPPA requires operators of commercial websites and online services that collect personally identifiable information ("**PII**") from California residents to post a conspicuous privacy policy disclosing their data practices.

### 9.1 Personally Identifiable Information Collected

As described in Section 3 of this Privacy Policy, we may collect the following categories of PII from California residents who visit our Site:

- First and last name
- Email address, phone number, and mailing address



- IP address and device identifiers
- Any other information you voluntarily submit through the Site

## 9.2 How We Respond to 'Do Not Track' Signals

Some web browsers offer a "Do Not Track" ("DNT") setting that signals to websites that the user does not wish to be tracked. CalOPPA requires us to disclose how we respond to DNT signals.

At this time, our Site does not respond to or alter its data collection practices in response to DNT signals from browsers, as there is no uniform technical standard for interpreting such signals. We will continue to monitor developments in this area and update this disclosure if our practices change.

If you wish to limit tracking on our Site, you may adjust your browser settings, opt out of analytics tools such as Google Analytics (<https://tools.google.com/dlpage/gaoptout>), and manage cookie preferences through our cookie consent tool where available.

## 9.3 Third-Party Tracking

Third parties may collect PII about your online activities over time and across different websites when you use our Site. We do not control these third parties' tracking practices. Please refer to the privacy policies of those third parties for information about their data collection and opt-out options.

## 9.4 Updating Your Information

California residents who have provided PII to us may request that we review, correct, or delete that information by contacting us at the address provided in Section 14. We will respond to verifiable requests within a reasonable time.

## 9.5 Policy Updates

If we make material changes to our information practices, we will update this Privacy Policy and revise the effective date. We encourage you to review this Policy periodically. Continued use of the Site following any update constitutes acceptance of the revised Policy.

## 10. Data Security

We implement industry-standard technical, administrative, and physical safeguards to protect your personal information against unauthorized access, disclosure, alteration, or destruction. These measures include encryption, secure socket layer (SSL) technology, access controls, and regular security assessments.

However, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security of your information transmitted to Heven Aerotech nor will any of Heven Aerotech's safeguards be construed as a warranty or promise of any kind that all information is absolutely secure and Heven Aerotech disclaims any liability regarding a breach of collected information including by interference of third-party criminal actions.

## 11. Data Breach Notification



In the event of a security breach that compromises the security, confidentiality, or integrity of your unencrypted personal information, we will notify affected users as required by the applicable law. Notification will be provided in the most expedient time possible and without unreasonable delay, consistent with any measures necessary to determine the scope of the breach and restore the integrity of the system.

## **12. Data Retention**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including compliance with legal, accounting, or reporting obligations. When personal data is no longer needed, we will securely delete or anonymize it in accordance with applicable law.

## **13. Third-Party Links and Services**

Our Site may contain links to third-party websites or services that are not operated by us. This Privacy Policy does not apply to those third-party sites. We encourage you to review the privacy policies of any third-party sites you visit. We are not responsible for the privacy practices of third parties.

## **14. Contact Information**

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

### **Heven Aerotech Inc.**

45240 Business Ct., Suite 400

Sterling, Virginia 20166

**Email:** [info@Hevenaerotech.com](mailto:info@Hevenaerotech.com)

**Phone:** +1 877 726 6269

## **15. Changes to This Privacy Policy**

We reserve the right to update or modify this Privacy Policy at any time for any reason including but not limited to expanding functionality or scope of use. If we make material changes, we will notify you by updating the "Last Updated" date at the top of this page and, where appropriate, by sending you an email notification or displaying a prominent notice on our Site. Your continued use of the Site after any changes constitutes your acceptance of the revised Privacy Policy.