

Privacy Policy (GDPR + CCPA Compliance)

Effective Date: 03/03/2026

Company: Turmac One, Inc.

1. Scope

This policy applies to users in:

- European Economic Area (GDPR)
- California (CCPA/CPRA)

2. Personal Data We Collect

We collect:

Identifiers

- Name, email, account details

Employment Information

- Company (airline or ground operator)
- Job title, role, assigned airport

Operational Data

- Task activity (e.g., deplane, cleaning, fueling)
- Flight assignments and timestamps

Technical Data

- Device, IP address, app usage

- **3. Legal Basis (GDPR)**

We process your data under:

- **Contractual necessity** (to provide the service)
- **Legitimate interests** (improving operations and analytics)
- **Consent** (for notifications and optional features)

4. How We Use Data

- Deliver real-time task assignments
- Enable crew coordination
- Provide analytics to supervisors
- Improve system performance

5. Data Sharing

We share data with:

- Your employer (controller/processor relationship)
- Infrastructure providers (e.g., hosting, messaging services)

We do NOT sell personal data.

6. International Transfers

Data may be processed in the United States or other countries. We implement safeguards such as:

- Standard Contractual Clauses (SCCs)
- Secure cloud infrastructure

GDPR RIGHTS

You have the right to:

- Access your personal data
- Correct inaccurate data

- Delete your data (“Right to be Forgotten”)
- Restrict processing
- Data portability
- Object to processing

To exercise rights, contact: [Insert Email]

CCPA / CPRA RIGHTS (California)

California residents have the right to:

1. Know

What personal data we collect and how it’s used

2. Delete

Request deletion of personal data

3. Correct

Request correction of inaccurate data

4. Opt-Out

We do NOT sell personal data

5. Non-Discrimination

We will not discriminate for exercising your rights

7. Data Retention

We retain personal data only as long as necessary for:

- Operational coordination
- Legal compliance
- Analytics improvement

8. Security Measures

We use:

- Encryption (in transit and at rest)
- Access controls
- Authentication systems

9. Automated Decision-Making

Turmac One uses automated assignment logic to assign tasks based on:

- Role
- Location (gate/zone)
- Workload

This does NOT produce legal or significant personal effects.

10. Contact & Data Requests

To exercise your rights:

Email: [Insert Email]

Address: [Insert Address]

11. Updates

We may update this policy periodically. Continued use of the service constitutes acceptance.