

## WEBSITE PRIVACY NOTICE

Willis Lease Finance Corporation, and its affiliates want you to be familiar with how we collect, use and disclose information. When we talk about “Willis”, or “we,” “us,” or “our,” in this Privacy Notice, we are talking about the Willis Lease Finance Corporation Group, including its subsidiaries and affiliates (as more particularly described at paragraph 11 below). Willis is committed to protecting and respecting your privacy. This Privacy Notice tells you about your privacy rights and sets out how we, as a Data Controller, collect and process personal data about:

- visitors to our websites ;
- individuals who apply for jobs through our website;
- individuals who we communicate or interact with in the course of our business;
- individuals whose personal data is provided to us in connection with the provision of our services.

Collectively, we refer to the websites, emails, services and offline interactions as the “Services.”

This Privacy Notice should be read in conjunction with our [WLFC Cookie Policy](#).

### 1. Information that we collect

There are instances where we invite or request individuals to provide us with their personal data, including through our website. In addition, individuals may volunteer their personal data to us by various means of communication, e.g., by telephone, email, post or via our website.

In providing our services, we may also receive personal data indirectly. Categories of such personal data include names, addresses, contact information and other information that is relevant to the provision of our services. Where we carry out information searches and verify your identity then we may source information from external sources such as company registries, beneficial owner registries and credit registries.

We may collect and process the following categories of personal data from you, as described above:

- Names, address, telephone numbers, email addresses, employer, role, social media, photographs, video and other contact data;
- Personal data from the devices that you used to access our websites, as set out in our [WLFC Cookie Policy](#);
- Identification data including passports, identification cards, visas, visa applications, driving licenses, travel itineraries, signatures, shareholdings, directorships, academic background, powers of attorney and utility bills;
- Gifts and entertainments given and received from you or your company;
- Resumes or CVs, references and other data related to your application;
- Information obtained during business transactions and meetings.

## 2. How we use personal data we collect

We will only use your personal data for the purposes and legal bases set out in the table below.

Purpose(s) for Processing	Legal Basis
To manage our relationship with you and provide our services.	<ul style="list-style-type: none"> <li>• To perform our contract with you.</li> <li>• To comply with our legal obligations.</li> <li>• To support our legitimate interests of managing our business and providing our services, provided such interests are not overridden by your interests and rights - you have the right to object at any time.</li> </ul>
For the prevention and detection of fraud, money laundering or other crimes or for the purpose of responding to a binding request from a public or regulatory authority or court.	<ul style="list-style-type: none"> <li>• To comply with legal and regulatory obligations.</li> </ul>
Compliance with our legal, regulatory and professional requirements.	<ul style="list-style-type: none"> <li>• To comply with legal and regulatory obligations.</li> </ul>
Direct marketing about our services.	<ul style="list-style-type: none"> <li>• Your consent - which you can withdraw at any time by contacting us at <a href="mailto:dataprotection@willislease.com">dataprotection@willislease.com</a>.</li> </ul>
Managing and operating our website - to keep our website updated and relevant, to develop our business and to inform our marketing strategy.	<ul style="list-style-type: none"> <li>• To support our legitimate interests of managing our business and providing our services, provided such interests are not overridden by your interests and rights - you have the right to object at any time.</li> </ul>
Processing of job and other work experience related applications.	<ul style="list-style-type: none"> <li>• To perform or enter into a contract with the data subject.</li> <li>• To support our legitimate interests in managing our business and providing our services, provided such interests are not overridden by the rights and interests of the data subjects concerned.</li> </ul>

Transferring information to third parties, including to our own service providers.	<ul style="list-style-type: none"><li>• To support our legitimate interests of managing our business and providing our services, provided such interests are not overridden by your interests and rights - you have the right to object at any time.</li><li>• To comply with our legal obligations.</li><li>• To protect vital interests.</li></ul>
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Where personal data is required for a contractual purpose or to comply with legal and regulatory obligations then we may not be able to proceed with the service or transaction where the personal data is not provided. We will store your personal data only for as long as necessary for the purposes of providing access to our website and our services to you; as required by law; and for the exercise or defence of legal claims.

### 3. Retention of your data

We retain personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you
- The length of time we have an ongoing relationship with you as our client and provide you with our Services;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions or communications for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- We will retain personal data about job applicant candidates for no more than one year. Any health data collected in the context of managing health epidemics or pandemics will be retained for only so long as legally required.

Our retention practices may be reviewed and updated from time to time in line with legal requirements and best practice.

### 4. Disclosure of your information

We aim to limit access to personal data to only those who have a business need. We'll always conduct a full review of our suppliers' processes and procedures including storage solutions for our data to ensure adequacy when sending your data outside of the UK and EEA, we put in place contracts based on the EU standard contractual clauses to guarantee adequacy, we also use alternative safeguards where standard contract clauses are not suitable.

We may also disclose your personal data to:

- Any member within our group of related companies including subsidiaries, joint ventures, affiliates and their subsidiaries;
- A third party who provides a service to us (including our Internet Service Provider who records data on our behalf and is bound by confidentiality provisions);
- A third party where we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply other agreements, or to protect the rights, property or safety of our customers, or others;
- A third party where it is necessary to protect the vital interests of the data subject or another natural person;
- A third party where necessary for our legitimate business interests to protect the rights, property, or safety of our customers, or others.

Where required, we will use your information to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our Service users is among the assets transferred

## **5. International transfers of personal data**

Our products and services may be provided using resources and servers located in various countries around the world. It is possible that your personal data may be transferred across international borders including to countries outside the European Economic Area (EEA) or the UK that do not have laws providing specific protection for personal data or that have different legal rules on data protection. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data. To address concerns about transfers from the UK or EEA to countries not considered adequate by the European Commission, we have implemented appropriate measures to protect your personal data. As your data is stored safely and securely both inside and outside of the EEA or the UK, we cannot offer alternative storage solution if you wish to object to having your data stored outside of the EEA.

## **6. Your rights**

- You can ask us for a copy of the personal information we hold about you.
- You can ask us about how we collect, share and use your personal information.
- You can ask us to update and correct your personal details.
- You can request that we restrict processing of your personal data in certain circumstances.
- You can object to processing that is carried out where we have decided that it is important for us as a business (legitimate interests).
- In certain circumstances, you may ask us to delete your personal information.
- You have a right to move your information (your right to Portability). Where you have provided information in a structured, commonly used and machine readable format we can share a digital copy of your information directly with you or another organisation.

- You can object to any automated decision making, including profiling, where the decision has a legal or significant impact on you.
- You have a right to request access to your personal information.
- You can change your mind wherever you give us your consent and withdraw that consent, such as for direct marketing.

If you are a resident of the EU/EEA, you also have a right to lodge a complaint with a supervisory authority in your country or jurisdiction of residence. You can find contact details for relevant supervisory authority for your country of residence: [HERE](#)

If you wish to exercise any of these rights, please contact us (see Contact Us below). Use the email address associated with the personal information we have collected about you to make your request. If you no longer have access to that email address, you will need to verify your identity through another piece of information we have collected about you, such as your phone number via SMS or voice call, or your address through mail. If we cannot verify your identity, we cannot fulfil requests to exercise any rights accorded to you by CCPA or GDPR.

We will endeavour to respond to your request within all applicable timeframes. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

## **7. Marketing**

You have choices regarding marketing-related communications. If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by following the unsubscribe instructions in any such message or by contacting us by email at [dataprotection@willislease.com](mailto:dataprotection@willislease.com). We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

## **8. Contact Us**

Questions, comments, requests and complaints regarding this Privacy Notice and the personal data we hold are welcome and should be addressed to [dataprotection@willislease.com](mailto:dataprotection@willislease.com) or sent in writing to Willis Lease Finance Corporation. All requests will be dealt with promptly and efficiently.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

## **9. Use of services by minors**

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under eighteen (18).

## **10. Security**

We seek to use reasonable organisational, technical and administrative measures to protect personal data within our organisation. To take full advantage of all security features you should use an up-to-date browser. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section above.

## **11. Affiliates**

For purposes of this Privacy Policy, these entities are considered to be “affiliates” of Willis Lease Finance Corporation,

- Willis Asset Management Limited,
- Willis Aeronautical Services, Inc,
- Willis Lease Finance (Ireland) Limited,
- Willis Lease Finance (China) limited,
- CASC Willis Engine Lease Company Limited,
- Willis Lease France,
- Willis Lease Marine LLC,
- Willis Aviation Services Limited, and
- Willis Lease Singapore Pte Limited

## **12. Links to other websites**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

## **13.Changes to this privacy notice**

We reserve the right to make changes to this Privacy Notice at any time without prior consultation. The “Last updated” text at the top of this Privacy Notice indicates when it was last revised. We may change this notice at any time with or without notice. Any changes will become effective when we post the revised privacy notice on this site’s home page. We recommend that you re-visit this notice from time to time to learn of any such changes. If this notice is changed in a material way, we will add text advising of such change at the beginning of this notice and on this site’s home page for thirty (30) days.