

PRIVACY NOTICE

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer and our wider operations in the European Economic Area (EEA).

Key terms

It would be helpful to start by explaining some key terms used in this notice:

we, us, our	Airline Components International Limited or ACI
personal data	Any information relating to an identified or identifiable individual
special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
data subject	The individual who the personal data relates to

Personal data we collect about you

The personal data we collect about you depends on the particular products and services we provide to you. We will collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details
- your gender, if you choose to give this to us
- your billing information, transaction and payment card information
- your professional interests
- your professional online presence, e.g. LinkedIn profile
- your contact history and purchase history
- Information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions

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We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

How your personal data is collected

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or LinkedIn etc;
- directly from a third party, e.g.:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
- from a third party with your consent, e.g. *project integrator or design house working with ACI on your behalf*;
- from cookies on our website—for more information on our use of cookies, please see our cookie policy *which is available on our website at www.airlinecomponents.com*
- via our IT systems, e.g.:
 - through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract

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What we use your personal data for	Our reasons
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to <i>our financial performance, customer base, product range or other efficiency measures.</i>	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	Depending on the circumstances:

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What we use your personal data for	Our reasons
	—for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide the goods and services	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Updating and enhancing customer records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests, i.e. to promote our business to existing and former customers
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts <i>to the extent not covered by 'activities necessary to comply with legal and regulatory obligations' above</i>	Depending on the circumstances: —for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards; —to comply with our legal and regulatory obligations

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What we use your personal data for	Our reasons
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets

How and why we use your personal data—Special category personal data

We do not routinely collect or ask you to provide any special category personal data.

Where we process special category personal data (e.g. food allergy), we will only process it with your explicit consent.

How and why we use your personal data—sharing

See 'Who we share your personal data with' for further information on the steps we will take to protect your personal data where we need to share it with others.

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Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You do, however, have the right to opt out of receiving marketing communications at any time by:

- contacting us at info@airlinecomponents.com;

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations outside ACI for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our products and services to you, e.g. our subcontractors and agents, payment service providers, warehouses and delivery companies;
- Our authorised distributors (where we do not have a physical presence in your location).
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;

We only allow those organisations to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Who we share your personal data with—in more detail

More details about who we share your personal data with and why are set out in the table below.

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Recipient	Processing operation (use) by recipient	Relevant categories of personal data transferred to recipient
Future Metals LLC. United Kingdom Division, Unit C, Maidstone Road, Kingston, Milton Keynes, MK10 0BD	Use personal data for legitimate interests, including performance of contract or to send you updates (by email, text message, telephone or post) about our products and services, including new products and services.	<i>Any of the personal data we collect about you</i>
Future Metals LLC Europa Division. Sportlaan 1-B 4209 AX Schelluinen, Netherlands	Use personal data for legitimate interests, including performance of contract or to send you updates (by email, text message, telephone or post) about our products and services, including new products and services.	<i>Any of the personal data we collect about you</i>
Future Metals LLC Poland Division, UI, Logistyczna 8, 55-040 Bielany Wroclawskie	Use personal data for legitimate interests, including performance of contract or to send you updates (by email, text message, telephone or post) about our products and services, including new products and services.	<i>Any of the personal data we collect about you</i>
Orderwise Newton Court, Saxilby Enterprise Park, Skellingthorpe Road, Saxilby, Lincoln United Kingdom LN1 2LR ERP Software provider.	Tech Support	<i>Any of the personal data we collect about you</i>
Aegis Computers 1-2 St Johns Yard, Main Road, Fyfield, Abingdon, United Kingdom, OX13 5LN.	Tech Support / IT administrator.	<i>Any of the personal data we collect about you</i>
Teamworks	Tech Support	<i>Any of the personal data we collect about you</i>

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Recipient	Processing operation (use) by recipient	Relevant categories of personal data transferred to recipient
Teamwork.com, Teamwork Campus One, Blackpool Retail Park, Blackpool, Cork, Ireland T23 F902		
The Sage Group plc C23 - 5 & 6 Cobalt Park Way, Cobalt Park, Newcastle-Upon-Tyne, Tyne & Wear, NE28 9EJ	Tech Support	<i>Any of the personal data we collect about you</i>

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see ‘How to contact us’ below).

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: ‘Who we share your personal data with’).

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: ‘Transferring your personal data out of the UK and EEA’.

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used or to comply with our legal and regulatory obligations.

Transferring your personal data out of the UK and EEA

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We may transfer your personal data to:

- our subcontractors located outside the UK; and
- our authorised distributor located in the USA.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy regulation**’) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available at <https://ico.org.uk/>. We rely on adequacy regulations for transfers to the following countries: USA
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy decision**’) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available at https://commission.europa.eu/law/law-topic/data-protection_en. We rely on adequacy decisions for all transfers to EU countries.

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- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK/EEA, we do so on the basis of an adequacy regulation or (where this is not available), legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR and/or EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this notice.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on '**Changes to this privacy notice**' below.

International transfers of your personal data outside the UK and EEA—in more detail

More details about the countries outside the UK to which your personal data is transferred are set out in the table below.

Recipient country	Recipient	Processing operation (use) by recipient	Lawful safeguard
USA	Future Metals LLC Headquarters 10401, State Street, Tamarac, Florida, 33321 Washington Division, 15022 Puyallup Street, Suite 104 Sumner, WA 98390 California Division, 6603 Darin Way, Cypress, CA 90630 Texas Division, 3751 New York Avenue, 100 Arlington, Texas Ohio Division, 4736 Wadsworth	Processing of your personal data (as controller) to provide products and services directly to you	Legally approved standard data protection clauses for transfers from a controller to processor recognised or issued further to Article 46(2) of the UK GDPR To obtain a copy of the <i>standard data protection clauses</i>, please refer to Future Metals LLC's parent company Marmon Holdings LLC Privacy Policy at https://www.marmon.com/privacy-policy/

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Recipient country	Recipient	Processing operation (use) by recipient	Lawful safeguard
	Road, Dayton OH 45414 New England Division, 22 North Plains Industrial Road, Suite 6B, Wallingford, CT 06492		
Singapore	Future Metals LLC, Singapore Division, 71 Alps Avenue, #03-01 Singapore 498745	Processing of your personal data (as controller) to provide products and services directly to you	Legally approved standard data protection clauses for transfers from a controller to processor recognised or issued further to Article 46(2) of the UK GDPR To obtain a copy of the <i>standard data protection clauses</i> , please refer to Future Metals LLC's parent company Marmon Holdings LLC Privacy Policy at https://www.marmon.com/privacy-policy/
India	Future Metals LLC, India Division, #400 Silveroak Road, Sector 43, Satyavedu Mandal, Chittoor District, Andhra Pradesh	Processing of your personal data (as controller) to provide products and services directly to you	Legally approved standard data protection clauses for transfers from a controller to processor recognised or issued further to Article 46(2) of the UK GDPR To obtain a copy of the <i>standard data protection clauses</i> , please refer to Future Metals LLC's parent company Marmon Holdings LLC Privacy Policy at https://www.marmon.com/privacy-policy/

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Recipient country	Recipient	Processing operation (use) by recipient	Lawful safeguard
USA	PTC, Onshape 121 Seaport Boulevard, Boston, Massachusetts, MA-02210-2050, United States.	Tech support	Legally approved standard data protection clauses for transfers from a controller to processor recognised or issued further to Article 46(2) of the UK GDPR To obtain a copy of the <i>standard data protection clauses</i> , please refer to PTC™ Onshape™ Privacy policy at https://www.ptc.com/en/documents/policies/privacy
USA	Squarespace 225 Varick Street, New York City, New York, United States.	Website Tech support	Adequacy regulation – https://www.legislation.gov.uk/uksi/2023/1028/contents/made Adequacy decision - https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en

Transferring your personal data out of the UK and EEA—further information

If you would like further information about data transferred outside the UK/EEA, please contact us (see ‘How to contact us’ below).

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Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time You may withdraw consent by emailing info@airlinecomponents.com Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For more information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and

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- provide enough information to identify yourself (*e.g. your full name, address and customer number*) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) and/or the relevant supervisory authority in your jurisdiction. Please contact us if you would like further information.

For a list of EEA data protection supervisory authorities and their contact details see https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

Changes to this privacy notice

This privacy notice was last updated on 2 Oct 2025.

We may change this privacy notice from time to time—when we do, we will inform you *via our website*.

Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, e.g. your surname or address—see below '**How to contact us**'.

How to contact us

Individuals in the UK & EEA

You can contact us by post, email or telephone if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
8 – 10 Eyston Way, Abingdon, Oxfordshire, OX14 1TR United Kingdom
info@airlinecomponents.com
+44(0)1235 535300