

PRIVACY NOTICE

This notice contains information relating to the processing of personal data that is carried out when the Drone Service Application developed by SkeyDrone and provided by skeyes (the “**Application**”) is used (the “**Use**”) by any natural person regardless of their capacity and location (the “**User**”).

The Use of the Application is subject to the [Terms and conditions of use](#).

The personal data identified in this notice are processed in accordance with the legislation in force on the protection of personal data, including, in particular, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – the “**GDPR**”), as well as the Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data, as amended and supplemented (together the “**Applicable Data Protection Rules**”).

Identity of the controller for the processing of personal data

skeyes, an autonomous public company whose registered office is located at 1000 Brussels, Square De Meeûs 35 and whose operational office is at 1820 Steenokkerzeel Tervuursesteenweg, 303, B.C.E. No. 0206.048.09 shall collect and process the personal data identified in this notice in the context of the Use of the Application by the User.

Within this context, skeyes is responsible for the processing of the personal data. Where reference is made in this notice to the "controller", skeyes is referred to.

skeyes has entrusted the development and management of the Application to SkeyDrone, whose registered office is located at 1000 Brussels, Square De Meeûs 35 and whose operational office is located at 1820 Steenokkerzeel, Tervuursesteenweg 303, B.C.E. No 0743.488.073 (“**SkeyDrone**”), which processes, in its capacity as a "processor", certain personal data relating to the Use of the Application by the Users on behalf of and in accordance with the instructions from the controller. SkeyDrone will share anonymised flight authorization and location data of all flight requests within the geographical zones under the responsibility of skeyes with selected partners for safety reasons only. Anonymisation and data sharing will be subject to SkeyDrone’s own privacy statement.

Purposes of the processing of personal data

The personal data are collected and processed for the following purposes:

- Providing access to the Application and enabling the Use of the Application;
- The following activities in connection with air traffic safety:
 - promote air traffic safety;
 - raise awareness of air safety and other issues;
 - understand air traffic situations;
- The following activities in connection with the flight of Unmanned Aircraft System:
 - support the preparation and execution of an operation with an Unmanned Aircraft System;
 - manage flight authorisation requests for UAS operation in specified UAS geographical zones;
 - enable coordination and communication with the relevant controlling unit;
- Data subject access requests management in case of exercise of their rights by Users;
- Organisation management.

Providing access to the Application and enabling the Use of the Application

Legal obligation

skeyes collects and processes the personal data to comply with its legal obligations under the regulations on flights of Unmanned Aircraft Systems, in particular the Regulation 2019/947, the Royal Decree of 8 November 2020 and the Ministerial Decree of 21 December 2020, which makes the Use of the Application mandatory for all flights of Unmanned Aircraft Systems in the UAS geographical zones managed by skeyes

Personal data	Collection of data	Retention
<ul style="list-style-type: none">- Identification data: name, first name, operator- registration number, telephone number, mobile phone number, and e-mail address,- Operator ID- Certain User settings: preferred language,- coordinates and units of measurement	Provided by SkeyDrone	<p>As long as the account is active.</p> <p>If the User has not used the Application at least once in the preceding 12 months, skeyes will delete the account and all related personal data.</p> <p>If a User deletes their account, all related personal data will also be deleted</p>

Air traffic safety:

- **Promote air traffic safety**
- **raise awareness of air safety and other issues**
- **understand air traffic situations**

Public interest

The processing of personal data is necessary for the exercise of the public authority conferred on skeyes by the Belgian State, namely the task of ensuring the safety of air traffic, in particular the provision of essential services

Personal data	Collection of data	Retention
<ul style="list-style-type: none">- Identification data: name, first name, operator registration number, telephone number, mobile phone number, and e-mail address, Operator ID- Certain User settings: preferred language, coordinates and units of measurement	Provided by the User	<p>As long as the account is active</p> <p>If the User has not used the Application at least once in the preceding 12 months, skeyes will delete the account and all related personal data.</p> <p>If a User deletes their account, all related personal data will also be deleted</p>

Flight of Unmanned Aircraft System:

- support the preparation and execution of an operation with an Unmanned Aircraft System
- manage flight authorisation requests for UAS operation in specified UAS geographical zones
- enable coordination and communication with the relevant controlling unit

Legal obligation

skeyes collects and processes the personal data to comply with its legal obligations under the regulations on flights of Unmanned Aircraft Systems, in particular the Regulation 2019/947, the Royal Decree of 8 November 2020 and the Ministerial Decree of 21 December 2020, which makes the Use of the Application mandatory for all flights of Unmanned Aircraft Systems in the UAS geographical zones managed by skeyes

Personal data	Collection of data	Retention
<ul style="list-style-type: none"> - Identification data: name, first name, operator registration number, telephone number, mobile phone number, and e-mail address, Operator ID - Certain User settings: preferred language, coordinates and units of measurement - Log files of UAS operations: name of UAS operator, operator registration number, name of pilot(s), name of observers, type of UAS operation, characteristics of UAS used, 3D volume of the UAS operation, location(s) of take-off and landing, time(s) of take-off and landing 	<ul style="list-style-type: none"> - Provided by the User - Generated by the Use of the Application 	<p>Maximum 30 (thirty) days after the termination and/or cancellation of the operation, in order to allow subsequent investigation or until consent is withdrawn</p> <p>After this period, the operational details will remain available in the system, however, the personal data related to this request will be removed</p>

Automated decision-making: as part of the above processing activity, the following personal data: type of UAS operation, characteristics of UAS used, 3D volume of the UAS operation, location(s) of take-off and landing, time(s) of take-off and landing, are processed by skeyes based on predefined legal restrictions and objective criteria to determine whether a flight is authorised or not in an automated way. For instance, if an operator requests to fly higher than allowed in a specific UAS geographic zone or if the telephone number provided by the operator and which is necessary to contact the pilot in connection with the scheduled flight is not verified, the flight request will be automatically rejected by the Application.

Product improvement and customer engagement

The processing of personal data is necessary to allow for continuous product improvements and customer engagement. Only anonymized data is shared with 3rd party platforms.

Personal data	Collection of data	Retention
<ul style="list-style-type: none"> - UserId 	<p>Provided by SkeyDrone</p>	<p>As long as the account is active</p> <p>If the User has not used the Application at least once in the preceding 12 months, skeyes will delete the account and all related personal data.</p>

Personal data**Collection of data****Retention**

If a User deletes their account, all related personal data will also be deleted

Consent

The geo-location data is only used to provide the feature “Focus on my location”. A pop-up will ask the User permission to use their location. If the User does not give their consent, the User is not able to use this feature.

The User may withdraw their consent at any time by de-activating the feature

Personal data**Collection of data****Retention**

Geo-location of Users: based on the location functionalities of the web browser used

Provided by the User

Maximum 30 (thirty) days after the termination and/or cancellation of the operation, in order to allow subsequent investigation or until consent is withdrawn

After this period, the operational details will remain available in the system, however, the personal data related to this request will be removed

Data subject access requests management in case of exercise of their rights by Users, see section *Rights of Users* below

Legal obligation

skeyes collects and processes the personal data to comply with its legal obligations under the Applicable Data Protection Rules

Personal data**Collection of data****Retention**

- Identification data
- Contact data
- Data regarding the request itself

Provided by the User

One year after the request is closed

Recipients of the *personal data*

Only the User, skeyes and SkeyDrone and its sub-processors (IT service providers) have access to personal data.

Personal data are processed and stored within the territory of the European Union.

There is no connection and no exchange of data with social media such as, for example, Facebook.

Recipients of *anonymised data*

Anonymised personal data ('userid') is shared with ProductFruits and its subprocessors (<https://productfruits.com/policies/subprocessors>) for product optimization and customer engagement purposes.

In some instances, SkeyDrone will anonymise personal data collected via the Application including, but not limited to, flight authorisation, location data in a given geographical zone or number of aircraft pilots, and provide such anonymised data to Belgian third parties such as:

- Belgian public airports
- Critical infrastructure operators;
- Geo-zone managers;
- Law enforcement authorities;
- Aviation authorities.

Anonymisation of personal data collected via the Application will be performed in accordance with SkeyDrone's privacy statement.

In particular:

- **Brussels Airport Company NA/SA**, located at Boulevard Auguste Reyerslaan 80, 1030 Brussels, Belgium, with company number 0890.082.292 (RPR/RPM Brussels) will have access to anonymized flight authorization and location data of all flight requests within the geographical zone of the Brussels CTR, respecting their own privacy notice. Legal grounds for this data sharing are the obligations of Brussels Airport Company in the management of safety risks as defined in the exploitation license for the Brussels airport as defined in the royal decree of June 21st 2004 (Art. 3).
- **Belgian defence**, located at 1000 Brussels, Rue Lambermont 8, which is a User of the Application, will have access to data concerning the number of aircraft pilots. Those data are anonymized by SkeyDrone and strictly limited to those needed for the handling of flight requests within the UAS geographical zones under their responsibility, respecting their own privacy notice. Legal grounds for this data sharing are the obligations of Belgian defence.

Rights of Users

Users shall have the following rights with regard to their personal data, within the limits provided for by the Applicable Data Protection Rules:

- the right to consult their personal data and to receive further information about the processing and the right to receive a copy of the processed data;
- the right to request to update or correct personal data, if they are incorrect or incomplete;
- the right to request the deletion of personal data, or to restrict the way in which they are used, if the User considers that the controller has no (or no longer has) legitimate grounds for processing;
- for processing activities based on the User's consent: the right to withdraw their consent at any time and the right to data portability, i.e., the right to receive the processed personal data in a structured, commonly used and machine-readable format and to (have the controller) transfer said data to another controller;
- for processing activities based on the exercise of public authority: the right to object at any time to the processing unless justified by compelling and overriding legitimate reasons;
- the right to lodge a complaint with the Data Protection Authority ("DPA") via the form available on the DPA website:
<https://www.autoriteprotectiondonnees.be/introduire-une-requete-une-plainte> (French);
<https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen> (Dutch).

Contact details of the Data Protection Officer

To exercise the above-mentioned rights, as well as for any question, observation or request relating to the processing of their personal data, the User may contact the Data Protection Officer ("DPO") of skeyes as follows:

- by email to dpo@skeyes.be
- by post to skeyes, Tervuursesteenweg, 303, 1820 Steenokkerzeel, for the attention of the DPO.

In order for the DPO to process the request and ensure that skeyes is helping the right person, the User may be asked to provide additional information reasonably necessary to verify their identity.