

PRIVACY POLICY

Effective Date: 11/11/2025

Last Updated: NA

The Privacy Policy describes how Empirical Systems Aerospace, Inc., and its subsidiaries and affiliated entities (collectively, “Aerospace,” “we,” “our,” and “us”) process personal information about you. This Privacy Policy applies when you engage with us online or offline, such as when you visit or use our websites (each a “Site” and collectively “Sites”), contact our customer service team, purchase our products, or otherwise interact with us. If you need to receive this Privacy Policy in a different format, please contact us at inquire@esaero.com.

This Privacy Policy does not apply to personal information collected in the course of an employee’s employment (except that it does apply to job applicants).

BY USING THE SITES OR OTHERWISE PROVIDING US WITH YOUR PERSONAL INFORMATION, YOU ARE AGREEING TO THE PROCESSING OF INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

Categories of Personal Information We Collect

The type of information that we collect depends on your interaction and relationship with us. We collect the below categories and types of personal information with your consent or as otherwise required or permitted by law.

- **Identifiers.** We collect full name, email address, address, telephone numbers, signature, username and password, and other security information for authentication and access.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status, and disability information.
- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, interaction with advertisements, and browsing time.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual, or similar data including videos, photographs, or audio recording.
- **Geolocation Data.** We collect geolocation data which is data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that

is equal to or less than the area of a circle with a radius of 1,850 feet, except as prescribed by regulations

- **Professional or Employment Information.** We collect your job title, business contact details, and company entity. If you apply to work with us, we collect job application details such as your employment history, resume, and references as well as information on any relevant certifications or licenses.
- **Education Information.** If you apply to work with us, we collect education history.
- **Sensitive Personal Information.** We may collect limited government issued identification numbers (e.g., social security, driver's license, state identification card, passport number), and Account Log-In (e.g., username and password to online account with us).
- **Inferences.** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior, and attitude.

Sources Of Personal Information

We collect personal information in the following ways:

- **Directly from you.** We collect identifiers, financial information, personal characteristics or traits, commercial information, professional or employment information, education information, and sensitive personal information that you provide directly to us.
- **Passively from you.** We collect commercial information and internet or other electronic activity passively using tools.
- **When you visit our locations.** When you visit our offices or locations, we collect identifiers and audio/visual data.
- **Automatically.** When you access our Sites, we may collect identifiers, geolocation data, and internet or electronic usage data using tools.
- **From third parties, vendors and service providers.** We may receive identifiers, financial information, personal characteristics or traits, commercial information, professional or employment information, education information, and sensitive personal information from our service providers, vendors, and other third-parties.
- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect contact information, identifiers, audio/visual data, personal characteristics or traits, commercial information, professional or employment information, education information, sensitive information, internet or electronic usage data, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook, analyze data about how you

interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

Purposes for Collecting Personal Information

We use your personal information for the following business and commercial purposes:

- **Transactional.** We use identifiers, financial information, and commercial information to: (i) allow you to purchase and receive products and services that we offer; (ii) communicate with you; (iii) provide you with customer assistance; and (iv) provide supporting business activities such as billing and collections, procurement, and tax related activities.
- **Combination of Data.** We may combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third-party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.
- **Recruiting and Hiring.** We use identifiers, audio/visual data, professional or employment information, education information, financial information, and inferences to make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.
- **Analytical.** We use identifiers, usage data, geolocation data, commercial information, and inferences to analyze preferences, trends, and statistics.
- **Marketing and Promotional.** We use identifiers, financial information, geolocation information, and internet or electronic usage data to improve our marketing efforts, for prospecting of new customers, for customer relationship management, for customer engagement, to administer sweepstakes and promotions, to send you our newsletters, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Website and Systems.** We use internet or electronic usage data and geolocation data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems.
- **Develop and Improve Our Products and Services.** We use identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or

employment information to help us develop new products and services and to improve and analyze our existing products and service offerings.

- **Security and Fraud Prevention.** We use identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, education information, professional or employment information, and sensitive information to: (i) protect our Sites, premises, assets, systems, products, services and intellectual property; (ii) protect us, our affiliated companies, our employees, our carriers and others from fraud, theft, and other misconduct; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft, and misconduct including by verifying the identity of those we are conducting business with.
- **Legal.** We use identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, education information, professional or employment information, and sensitive information to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Corporate Transactions.** If Aerospace is merged, acquired, or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, education information, professional or employment information, and sensitive information in connection with such transaction.
- **Other Purposes.** We may use identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, education information, professional or employment information, and sensitive information for other reasons we may describe to you.

How We Disclose Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting providers, analytics, payment processing, background and credit checks, attorneys, accountants, order fulfillment, email delivery, insurance, internet service providers, operating systems and platforms, recruiting vendors, credit verification, maintenance and customer support services). In some cases, the vendor or service provider may directly collect the information from you on our behalf.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.

- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

Opting Out of Marketing

You may opt out of receiving marketing emails you receive from us. To do so, follow the instructions in the message you receive or contact us at inquire@esaero.com. You may still receive our transactional and relevant operational communications.

Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

Links to Other Websites

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

If we become aware of a breach that affects the security of your personal information, we may provide you with notice as required by applicable law. To the extent permitted by applicable law, we may provide any such notice that we must provide to you under applicable law at your account's email address. By using the services, you agree to accept notice electronically.

Our Sites are Not Intended for Children

We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to inquire@esaero.com.

Florida Privacy Rights

This section applies to residents of Florida.

We set forth above the categories of personal information we process, the purpose for processing personal information, the categories of personal information shared, and the categories of third parties with whom personal information is shared. Residents of Florida have the following rights with respect to personal information:

- **Right to Access.** You have the right to obtain a copy of your personal information.
- **Right to Correct.** You have the right to correct inaccurate personal information that we hold about you, taking into account the nature of the personal information and the purposes of the processing of the information.
- **Right to Delete.** You have the right to request that we delete personal information that we have collected from you or obtained about you.

- **Right to Confirmation.** You have the right to request that we confirm whether or not we are processing your personal data and to access your personal information.
- **Right to Opt-Out.** You have the right to opt out of the processing of the personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of a decision that produces a legal or similarly significant effect concerning you. You also have the right to opt out of the collection of sensitive information or collection of personal information through the operation of a voice recognition or facial recognition feature.

California Privacy Rights

This section applies to residents of California.

Shine The Light. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at inquire@esaero.com and include "CA Shine the Light" in the subject line of your email.

Sale or Sharing of Personal Information. In the 12 months preceding the last updated date below, we have not "sold" to or "shared" personal information with (as those terms are defined in the California Consumer Privacy Act (CCPA) advertising/marketing/analytics partners.

Use or Disclosure of Sensitive Personal Information. In the 12 months preceding the last updated date above, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Disclosures for a Business Purpose. In the 12 months preceding the last updated date below, we have disclosed the following categories of personal information to these categories of recipients for a business purpose.

- Identifiers: service providers and affiliates.
- Protected Characteristics Under Federal or State Law: service providers and affiliates.
- Audio/Visual Data: service providers and affiliates.
- Commercial Information: service providers and affiliates.
- Education Information: service providers.
- Internet or Electronic Usage Data: service providers and affiliates.
- Geolocation Data: service providers and affiliates.

- Professional or Employment Information: service providers and affiliates.
- Education Information: service providers and affiliates.
- Information described in Cal. Civ. Code § 1798.80(e): service providers and affiliates.
- Sensitive Personal Information: service providers and affiliates.
- Inferences: service providers and affiliates.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, you have the following rights:

- To request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third parties to whom we have disclosed personal information.
- To request that we provide you with a copy of your personal information.
- To request that we delete your personal information, subject to certain limited exceptions.
- To opt-out of: (i) the sale of your personal information, or (ii) the sharing of your personal information for cross-context behavioral advertising or targeted advertising.
- To direct us to limit the use or disclosure of your sensitive personal information.
- To correct inaccurate personal information that we hold about you.
- To not be discriminated against for exercising any of your rights.

Exercising Your Rights

To exercise any of your rights, please use email us at inquire@esaero.com or call us toll free at 805.275.1053. For all requests, you must provide us with your name, email address, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation. In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us.

We will not discriminate against you for exercising any of your privacy rights under applicable law and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your rights.

Appealing Our Decision. If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response. You may exercise your appeal rights by emailing us at inquire@esaero.com. Please include your full name, the basis for your appeal, and any additional information to consider.

Contact Us

If you have any questions about this Policy or our data practices, please email us at inquire@esaero.com.

Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The “Last Updated” legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Site.