

Privacy Notice

Last Updated: January 3, 2023

Kingston-Ulster Airport, LLC (we, us, our) is a privately-owned, public-use airport that is deeply committed to the local community. The Kingston-Ulster Airport began operations on September 1, 1961, providing aviation services to the local community. Once a 20-foot-wide grass strip, the Kingston-Ulster Airport now offers a paved, 60-foot-wide runway with FBO services provided by Richmor Aviation.

This Privacy Notice describes how we collect, use, and share personal information in connection with our services, websites, content, and activities (collectively, “Services”). We also describe your privacy rights and choices; how we transfer, retain, and protect data; and other aspects of our privacy program.

INFORMATION WE OBTAIN

The chart below explains the information we obtain when you interact with us or the Services. We obtain information from you, public sources, and third parties, as explained below.

Category	Description
Payment Information	If you make a payment through our website, we have access to your name and transaction information through our third party vendor, Payeezy (Fiserv, Inc.) provided through Bank of America
Communications and Contact Information	Any communications or outreach you choose to submit to us through our “Contact Us” channels, together with any contact information you provide
Cookies and Other Technologies	Information collected by cookies, web server logs, web beacons, and other technologies about your activity or interactions with our Services – see explanation below

Automated Means of Collection

When you interact with the Services, we may obtain certain information by automated means, such as cookies, web server logs, web beacons, and other technologies. A “cookie” is a text file that websites send to a visitor’s device to uniquely identify the browser or to store information or settings. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, may be used on web pages and emails to check whether a user has accessed certain content.

We may use these automated technologies on the Services to collect information about your equipment, browsing actions, and usage patterns. The information we obtain in this manner may include your IP address, device identifiers, device and browser characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of access. These technologies help us (1) remember your information so you do not have to re-enter it; (2) track and understand your usage and interactions; (3) measure usability and effectiveness; and (4) otherwise manage and enhance our services.

You can manage how your device and browser share certain data by adjusting the privacy settings they provide. The Services are not designed to respond to “do not track” signals from browsers, but you can change your cookie settings on our website. Please note, however, that without cookies you may not be able to use all of the features of the Services.

HOW WE USE INFORMATION

Why We Use Data (Lawful Basis)

Certain laws, such as [GDPR](#), describe various lawful reasons to “process” (i.e. collect, use, and share) personal information. Our reasons for processing are described below:

Lawful Basis	Description
Consent	We may ask for your consent to process your personal information for specified purposes at relevant times when you interact with the

	Services.
Contract	We process your information as necessary for the performance of a contract you have entered into with us, such as the Terms of Use.
Legal Obligations	We process information to comply with legal, tax, and compliance obligations or lawful requests for information from a court or government authority.
Protection from Harm	We process information where necessary to protect an individual from serious physical harm or injury.
Legitimate Interests	We process information for our and others' (including your) legitimate interests, such as commercial interests, individual interests or broader societal benefits.

We rely on “legitimate interests” when we use data in ways people would reasonably expect based on the circumstances, and where the use would have a minimal privacy impact, or where there is a compelling justification for the use. Our legitimate interests are described in the “How We Use Data” table below.

How We Use Data (Purposes for Processing)

We use personal information for the following purposes:

Purpose Category & Lawful Basis	Description
Provide the Services: <i>Legitimate interests</i>	<ul style="list-style-type: none"> • Identify you • Communicate with you about the Services and respond to your communications • Provide our website or other interactive features • Obtain services to operate and manage the Services, such as web and database hosting, payment processing, IT support, operations, communication services, research tools, and data analytics • Enable connections you request between the Services and third party tools or services • Verify information provided to us • Enforce our policies and terms

	<ul style="list-style-type: none"> • Perform data analytics, accounting, auditing and other internal functions
Safety and security: <i>Legitimate interests</i>	<ul style="list-style-type: none"> • Maintain and enhance the safety and security of the Services, protect against and prevent fraud, misuse, unauthorized transactions, claims, and other liabilities
Improve and develop the Services: <i>Legitimate interests</i>	<ul style="list-style-type: none"> • Evaluate and improve the Services • Perform debugging to identify, prevent, and repair errors that impair or may impair the Services • Verify or maintain the quality of the Services
Legal compliance and claims: <i>Legal obligations</i>	<ul style="list-style-type: none"> • Comply with applicable laws and regulations • Maintain or defend legal claims • Respond to valid requests for information from courts, litigants, and governmental or official agencies and organizations
Other uses	<ul style="list-style-type: none"> • We also may use information in other ways for which we will provide information when and if such uses arise

Third-Party Analytics

We may use third-party analytics services on the Services through our website provider, Squarespace. The information we obtain through our website may be disclosed to or collected directly by these services.

INFORMATION SHARING

We share the personal information we obtain as follows:

Category	Description
Affiliates	Our affiliates and related entities who provide assistance with operating and managing the Services
Service providers	Entities that perform services on our behalf, such as web and

	<p>database hosting, IT support, communication services, research tools, payment vendors, and data analytics</p> <p><i>Most of our service providers are located in the United States. We do not authorize service providers to use or disclose information except as necessary to perform services on our behalf or comply with legal requirements.</i></p>
Legal	<p>We may disclose personal information (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent or as directed by your representative.</p>

Please contact us as specified in the “How To Contact Us” section of this Privacy Notice if you would like to obtain more information about the affiliates, subsidiaries and other third parties with whom we may share personal information.

We reserve the right to transfer any personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

YOUR RIGHTS AND CHOICES

We offer you certain choices in connection with the personal information we collect from you. To update your preferences or submit a request, please contact us as indicated in the “How To Contact Us” section of this Privacy Notice.

Depending on the laws that apply to you, including [GDPR](#), you may have the rights provided below, some of which may apply generally, and some of which apply only in certain circumstances, described below:

Data Subject Right	Description
Access	Access personal information we process about you and obtain information about our processing
Rectification	Correct inaccurate information or supplement incomplete information
Erasure	Erase personal information, when, for instance, it is no longer needed or where you have withdrawn your consent and there is no other legal basis for the processing
Restrict Processing	Limit our processing of your information, for instance, where we no longer need it but you do not want it to be erased because it is needed in connection with a legal claim
Object	Object to processing for direct marketing purposes, or to processing based on “legitimate interests” (explained above) unless we have compelling reasons to continue processing or where it is needed in connection with a legal claim
Withdraw consent	Withdraw consent you’ve previously given, without penalty, but we will have to cease carrying out the purposes for which you consented to processing, which may affect our ability to provide certain aspects of the Services to you
Portability	Request that we provide you a copy of personal information you have provided us, where the processing is based on consent or is carried out by automated means

To exercise any of these rights, please contact us as indicated in the “How To Contact Us” section below. If you are located in the European Economic Area (EEA), you also may lodge a complaint with the data protection authority in your country of residence.

DATA TRANSFERS

We may transfer your personal information to recipients in other countries that have different data protection laws. When we do so, we will protect that information as described in this Privacy Notice and will comply with applicable legal requirements, providing adequate protection for the transfer.

If we transfer personal information from the EEA, UK or Switzerland to a country that has not been recognized by the European Commission as providing an adequate level of data protection, we will use appropriate contractual terms with the recipients to safeguard the information. Further information about our data transfer safeguards may be obtained by contacting us as indicated in the “How To Contact Us” section below.

RETENTION OF PERSONAL INFORMATION

We will retain your personal information for the duration of our relationship, plus a reasonable period to comply with the applicable statute of limitation periods and records retention requirements under applicable laws, or during the pendency of any legal claims or lawful requests or investigations.

HOW WE PROTECT PERSONAL INFORMATION

We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

CHILDREN’S PRIVACY

The Services are intended for individuals at least 18 years of age. We do not knowingly collect personal information online from children under the age of 13.

OTHER ONLINE SERVICES AND THIRD-PARTY FEATURES

For your convenience and information, we may provide links to other online services, and may include third-party features such as apps, tools, communication platforms or communities, widgets and plugins. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. These third-party services or features are not owned or controlled by us and we are not responsible for their information practices.

UPDATES TO OUR PRIVACY NOTICE

This Privacy Notice may be updated periodically for clarity or to reflect changes in law or our practices. We indicate at the top of this Privacy Notice when it was most recently updated. We encourage you to check this page frequently to review any changes. If we make changes, we will notify you via the change log below. In some cases, we may provide additional notice such as a statement on our homepage or an email. Your further use of the Services after a change to our Privacy Notice will be subject to the updated notice.

Change log

- August 24, 2022 - Privacy Notice first published.
- January 3, 2023 - Updated to reflect new entity name of Kingston-Ulster Airport, LLC

HOW TO CONTACT US

Kingston-Ulster Airport, LLC is responsible for processing personal information as described in this Privacy Notice.

If you have any questions, requests or comments about this Privacy Notice or to exercise your rights, please contact us via email at contact@kingstonulsterairport.com, via phone at 845-481-1559, or write to: 1161 Flatbush Ave., Kingston, NY 12401, Attn: Privacy.