Privacy Policy
As is with the majority of websites, our site collects data about www.hestonaviation.com (website) visitors. This helps us understand how useful our website is, how to improve it in the future and how to ensure all site’s functions’ operation.

By collecting data on the website in cases discussed hereafter, we always follow this Privacy Policy in which you will find comprehensive information about the type of data we collect, how we collect it and who has access to this data.

You have a lot of rights that allow you to control your privacy and we ensure the possibility for you to take advantage of it. It is important for us to create the conditions for you to make use of your rights thus hereafter you will find the information on how you can do that.

Please dedicate time to read through this policy and, in the case you would have questions or observations regarding this policy, please contact us.

Data controller
Your personal data controller is UAB Heston Aviation, registration code 304618456, headquarters’ address Vytenio st. 46, Vilnius, phone: +37052137577, e-mail info@hestonaviation.com.

What data we collect and how we use it

Server records
Server, in which our website is hosted, can record queries that you submit to the server (website address that you open, your IP address, login time, browser description, version of the protocol and query method). Such data is used to ensure safe and proper website functioning. What is more, if there happens to be a need, data is used to investigate possible security violations.

We manage this data on the basis of our lawful interest in ensuring site’s technical accessibility and safety. Collected data is stored for no longer than 7 days.

Website attendance statistics
In order to improve our website and expand our activities, we collect various pieces of site’s visitors’ data. It is important for us which information is interesting for the site’s visitors, how often they connect, which browsers and devices they use, what content they read most often, from which regions they are. Thus, for the purposes mentioned, we collect similar
demographic and statistical data. We manage this data based on our lawful interest in better understanding our clients’ needs and wishes so that we could properly expand and develop our activities and customise the advertisement tools being used.

We collect this information using “Google Analytics” tool which lets us capture and analyse previously mentioned data.

If you wish, you can find more information about how “Google Analytics” works and what information this tool allows to collect and analyses here: https://support.google.com/analytics/answer/1012034?hl=lten&ref_topic=6157800.

At any time you can disable the function of collecting data about you through “Google Analytics”, how to do it is explained here: https://tools.google.com/dlpage/gaoptout/.

Website’s attendance statistics is saved no longer than 2 years.

**Cookies**

A part of data on our website is collected using cookies.

**What are cookies?**

Cookies are small data files that a website saves on your device being used when you visit the site. This is done by the majority of sites. The recorded cookies allow the site to ensure its functionality, for example to remember your actions and selected settings for a certain time period (eg. language). This ensures easier use of the site as you do not need to enter options repeatedly when you visit the site or browse through its separate pages.

**Which cookies do we use and why?**

On our website we use these cookies:

<table>
<thead>
<tr>
<th>Cookie</th>
<th>Provider</th>
<th>Task</th>
<th>Expiry date</th>
</tr>
</thead>
<tbody>
<tr>
<td>_ga</td>
<td>.hestonaviation.com</td>
<td>Uses “Google Analytics“ to evaluate a user’s visitation purpose, prepare reports about the site’s activity for the site’s operators and to improve users’ experience when visiting the site</td>
<td>2 years</td>
</tr>
<tr>
<td><em>gat</em>*</td>
<td>.hestonaviation.com</td>
<td>Is used for collecting statistical information about the site’s attendance for „Google Analytics“ (information is collected about the browser being used, the computer, visitations, time spent)</td>
<td>Until site window is closed</td>
</tr>
</tbody>
</table>
So, on our site the cookies installed are used for these purposes:

- **To ensure site’s proper operation.** Cookies are very important for the website’s operation and they ensure smooth user experience for the user;

- **For the expansion of services.** When monitoring the use of cookies we can improve our website’s operation and the quality of services being provided. We receive information about, for example, which parts of our website are most popular, what websites our users connect to from our site, from which websites they access our site and how much time the users spend on our site;

- **For the analysis of usage.** We use cookies for collecting and analysing the statistical data about the number of persons that have visited our website, the results of which we can apply when improving and appropriately applying the services offered as well as implementing marketing tools;

- **To guide purposive marketing.** By using cookies we can also gather information for providing advertisements or content that are dedicated for a particular browser, creating separate purposive groups.

Cookies are installed onto your device only with your consent, with the exception of cookies that are necessary exclusively for ensuring the site’s technical operation. In the case you do not provide your consent for installing cookies, some of the site’s functions may not work partially or completely. Because of this reason we advise the site’s visitors to agree with the usage of cookies.

Cookies, necessary exclusively for ensuring the site’s technical operation are used by us based on our lawful interest for ensuring the website’s proper functioning.

**How to manage cookies?**
You can delete all cookies already stored on your device at any time, furthermore, the majority of browsers offer the option to prohibit the instalment of cookies. You can familiarise yourself with your opportunities in more depth here: 

However, let’s pay attention to the fact that once you delete the cookies, some services and functions on the website might not work properly, what is more, it can be needed to reset website’s options.

**Your inquiries**

In section “Contacts” of our website you have the ability to submit your requests, observations, opinions, inquiries (hereafter - referrals) by completing the form “Text us”. You can also apply to us by other means specified on the website. We will use your personal data indicated in a referral (name, email, phone number and information provided in a referral) to be able to provide you the information needed and to answer your questions. We also analyse the data in the referrals in order to take into consideration your provided opinions and suggestions and also to improve the quality of our services.

The legal basis for managing this data is our lawful interest in ensuring effective communication and evaluating site visitors’ responses and insights.

In the case your inquiries may cause legal consequences (claim, complaint, etc.) we will keep this type of data for the applicable limitation period.

**Who has access to your data**

Our employees who are responsible for the analysis of the collected data, marketing and website’s operation and improvement have the access to the data being collected on the site. When you contact us regarding the submission of a proposal, your personal data is managed by the employees who are responsible for the submissions of a proposals and further communications with customers.

Our partners (service providers) that provide IT services, site content management system provision and hosting services and other information systems supply services who act as our data managers can also have access or receive data.

„Google Analytics“ tool and other certain cookies are provided by the company „Google Inc.“, which operates from the USA. This means that data being collected using aforementioned tools is handed over outside the boundaries of the European Economic Area.
Taking that into consideration we inform you that „Google Inc.“ is committed to applying the EU-U.S. Privacy Shield which ensures that the service provider meets the EU privacy standard requirements. Agreed upon obligations are also applied to this provider to ensure privacy. You can read more about it here: https://www.google.com/analytics/terms/dpa/dataprocessingamendment_20160909.html.

All personal data that we manage under certain circumstances can be disclosed to third parties:

- As much as is necessary and allowed according to applicable legislations, for example, when demanded by state institutions, insurance companies, etc.;
- In instances when we believe honestly that the disclosure of data is necessary in order to defend our rights, ensure safety, investigate incidents, etc., for example, for legal service providers, prosecutor’s departament, courts, other dispute institutions, etc.

Your rights and how you can use them

With respect to your personal data being managed you have the right to:
- familiarise yourself with your personal data being managed;
- request to correct your personal data;
- revoke your given consent.

You also have the right to:
- request to limit the management of your personal data;
- request to delete your personal data;
- claim that you disagree that your personal data would be managed on the basis of our lawful interest;
- the relocation of your data,

however, the latter rights can can be not implemented in the case a certain situation does not meet all the necessary conditions. In this case we will inform you comprehensively about the reasons for not implementing such a right.

You can implement your rights by contacting us through email info@hestonavigation.com

You can revoke your consent for the use of cookies here:
- https://tools.google.com/dlpage/gaoptout/
- http://www.youronlinechoices.com/

How to submit a complaint
In the case you believe that we manage your personal data improperly or that your right to privacy is violated, you can submit a complaint to the State Data Protection Inspectorate, address L. Sapiegos st. 17, 10312 Vilnius, phone No. (8 5) 271 2804, 279 1445, fax (8 5) 261 9494, email ada@ada.lt.