

PRIVACY POLICY

SkyPass



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Last updated: 04 September 2026

Propair Flight Ltd. ("Propair", "we", "us", "our") built these apps to help you train efficiently and safely. This Privacy Policy explains, in plain language, what personal data we collect through the **SkyPass, SkyPass Mission Controller (MS)** apps (together, the "Apps"), why we collect it, and how we protect it.

It is written to meet the requirements of the Google Play Data Safety section, the Apple App Privacy ("Nutrition Label") disclosures, and the EU General Data Protection Regulation (GDPR). It should be read together with our Terms and Conditions and our AI Disclosure, which are available in the Apps and on our website.

For security reasons, this policy describes the outline of how our systems work rather than their exact technical implementation. If you have specific questions, you are welcome to contact us (see "Contact us" below).

1 WHO IS RESPONSIBLE FOR YOUR DATA

The data controller is **Propair Flight Ltd.**, Malom Udvar Offices, Soroksári street 48, 1095 Budapest, Hungary (Company Register: 01-09-950715, Commercial Court of the Budapest Regional Tribunal).

You can reach our privacy team at **office@propairflight.com**.

Where your employer or training organisation enrolls you on the Apps and manages your access, that organisation may also be a controller of some of your data (for example, your role and aircraft assignments). In that case, please also refer to your organisation's own privacy information.

2 WHAT DATA WE COLLECT, AND WHY

The table below summarises the personal data the Apps collect, why we collect it, and the legal basis we rely on under the GDPR.

DATA WE COLLECT	WHY WE COLLECT IT	LEGAL BASIS (GDPR)
Your name, email address, and general location (country and city)	To create and manage your account and to personalise your experience	Performance of a contract
Sign-in information that keeps you securely logged in, including short-lived security codes used to verify your email or reset your password	To verify that it is really you and to keep your account protected	Performance of a contract; our legitimate interest in account security
Basic profile details, only if you choose to sign in through a third-party identity provider (e.g. your organisation's Microsoft account)	To let you sign in using an account you already have, if you choose to	Your consent/ performance of a contract
Your assigned role and which aircraft or training modules you have access to	To show you the right training content for your role and to control access to it	Performance of a contract
Your course and module progress, time actively spent training, and quiz, questionnaire results	To save your progress, show what you have completed, and support your training or certification record	Performance of a contract; our legitimate interest in improving training content



DATA WE COLLECT	WHY WE COLLECT IT	LEGAL BASIS (GDPR)
Flight data generated during your practical training session in Microsoft Flight Simulator, such as aircraft position, altitude, speed, heading, flight path, aircraft configuration, control inputs and relevant flight events	To evaluate your practical flight performance, calculate your training results and provide automated analysis and feedback	To provide the training and assessment service you have requested (performance of our contract with you)
Your app settings (e.g. display, caption and audio preferences), recently viewed lessons, kept on your device	To remember your preferences and to let parts of the Apps work offline or load faster	Our legitimate interest in providing the service you have asked for
Basic technical information such as your device's network status and app version	To keep the Apps working reliably and to diagnose problems	Our legitimate interest in operating a secure and reliable service

DATA WE DO NOT COLLECT	WHY WE DO NOT COLLECT IT
Advertising identifiers, precise GPS location, payment card details, photos, contacts, browsing history or health data	The Apps do not show adverts, do not use advertising SDKs and do not process payments, so there is nothing to collect for those purposes

2.1 Learning-time tracking

The Apps record how long you are actively using a lesson or module (based on whether you are interacting with the App), together with the aircraft and module concerned. We use this to show you where you left off and to support your training record. We do not record what you type or your individual mouse or touch movements.

3 DATA STORED ON YOUR DEVICE

The Apps store some information directly on your device (for example, in the app's local storage or in the browser when you use the web version). This is not used for advertising or cross-site tracking.

STORED ON YOUR DEVICE	PURPOSE	STRICTLY NECESSARY?
Sign-in tokens and a temporary sign-in code	To keep you signed in securely and to complete the sign-in process	Yes
Session data set by our sign-in server while you log in	To complete the sign-in process	Yes, during sign-in
Display, caption, audio and other preferences	To remember how you like the App set up	Functional
Last viewed aircraft, lesson and step	To let you resume where you left off	Functional



You can clear this data at any time by signing out, clearing the App's data in your device settings, or uninstalling the App. The web version of the Apps does not use analytics cookies.

4 HOW LONG WE KEEP YOUR DATA

We only keep personal data for as long as it is needed for the purpose it was collected for, or as required by law.

TYPE OF DATA	HOW LONG WE KEEP IT
Account details (name, email, profile, role and access assignments)	For as long as your account is active, and for a limited period afterwards in case you wish to reactivate it or as required by law
Sign-in and security data (e.g. one-time codes, sign-in sessions)	Automatically deleted shortly after use, typically within minutes to a few hours
Third-party identity-provider sign-in data	For as long as you keep that sign-in method linked to your account
Training progress, quiz and assessment results and flashcard activity	For the length of your training relationship with us, and afterwards where needed to support certification or audit records (Maximum 3 years)
Active learning-time records	For the length of your training relationship with us
App settings and offline content stored on your device	Stays on your device until you clear the App's data or uninstall it
Backups	Even after data is deleted from our live systems, a copy may remain in secure backups for a limited period before being permanently overwritten (Maximum 3 years)

When you ask us to delete your account, we remove or anonymise your personal data across our systems, including our sign-in service, training records and access-control records, within the period required by law.

5 WHERE YOUR DATA IS STORED

We take a privacy-by-design approach to where and how your data is processed.

AREA	WHERE IT IS HANDLED
Core hosting	We use reputable, industry-standard cloud infrastructure to run the Apps and store your data securely.
Primary storage region	Your data is primarily stored and processed within the European Economic Area (EEA).
Practical flight evaluation	This feature may process flight data generated during your practical training session in Microsoft Flight Simulator in either the EEA or the United States, depending on how your account or organisation is configured.
Access and permissions	Your role and access permissions are managed by a dedicated access-control system, kept within the EEA.



AREA	WHERE IT IS HANDLED
Transfers outside the EEA	Where data does leave the EEA, we put legally recognised safeguards in place (such as the EU Standard Contractual Clauses or an adequacy decision, including the EU–US Data Privacy Framework where the provider is certified) to keep it protected.

6 HOW WE KEEP YOUR DATA SECURE

We use industry-standard technical and organisational safeguards designed to protect your data. In outline, this includes:

- / Encrypted connections between your device and the Apps, so data cannot easily be read in transit.
- / Your password is never stored in a readable form; it is protected using a secure, industry-standard hashing technique.
- / Access to your data is limited to authorised systems and personnel who need it to provide the service.
- / Sign-in sessions and one-time security codes expire automatically after a short period.
- / We regularly review our security practices, and only keep data for as long as it is needed.
- / We have processes in place to detect and respond to security incidents.

For security reasons, we do not publish the detailed technical implementation of these safeguards, but we are happy to answer general questions about our approach on request.

7 WHO WE SHARE DATA WITH

We only share personal data with trusted service providers who help us run the Apps. These are:

CATEGORY OF PROVIDER	WHAT THEY DO FOR US
Cloud hosting and infrastructure providers	Host the Apps, our databases and backups
Our authentication (sign-in) service	Verifies your identity and keeps you signed in
Our access-control service	Checks which content and features you are allowed to use
AI assistant service (only when you use it)	Generates answers to your training questions
Third-party identity provider (only if you choose it)	For example Microsoft, if you sign in with your organisation's account; we exchange only the minimum information needed to sign you in
App store platforms (Apple, Google)	Distribute the Apps; they process your app-store account data under their own privacy policies

Each of these providers is bound by confidentiality and data protection obligations, and may only use your data to provide the service to us, never for their own advertising or marketing purposes.

We may also disclose personal data where required by law, to protect our rights, or with your organisation where it manages your enrolment. **We never sell your personal data, and we never share it for third-party advertising.**



8 ADVERTISING AND TRACKING

The Apps do not display third-party advertisements, do not use advertising or ad-tracking software of any kind, and do not track you across other companies' apps or websites. For this reason we do not request tracking permission under Apple's App Tracking Transparency framework.

9 CHILDREN'S PRIVACY

The Apps are intended for professional and enthusiast flight-simulation training and are not directed at children. You must be at least 18 years old to create an account. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us so we can delete it.

10 YOUR RIGHTS

Depending on where you live, you have the right to:

- / access the personal data we hold about you;
- / correct inaccurate data;
- / ask us to delete your data ("right to be forgotten");
- / restrict or object to certain processing, including processing based on our legitimate interests;
- / receive a copy of your data in a portable, machine-readable format; and
- / withdraw any consent you have given, at any time, without affecting the lawfulness of processing before withdrawal.

10.1 How to delete your account

You can request deletion of your account and associated data at any time by **office@propairflight.com** from the email address linked to your account. We will confirm your request, verify your identity where necessary, and complete the deletion within 30 days. Some information may be retained where the law requires it (for example, certification records that your training organisation must keep).

10.2 Exercising your other rights

To exercise any of these rights, please contact us at **office@propairflight.com**. We will respond within the timeframe required by law (normally one month), and we may need to verify your identity first.

You also have the right to lodge a complaint with your local data protection authority. In Hungary, this is the National Authority for Data Protection and Freedom of Information (NAIH), 1055 Budapest, Falk Miksa utca 9–11, www.naih.hu.

11 USERS IN THE UNITED STATES

If you live in a US state with a consumer privacy law (such as California), you may have additional rights to know, access, correct and delete your personal information and to opt out of its "sale" or "sharing". We do not sell or share personal information for cross-context behavioural advertising. You may exercise your rights by contacting us at office@propairflight.com; we will not discriminate against you for doing so.



12 CHANGES TO THIS POLICY

We may update this policy from time to time to reflect changes in the Apps or in the law. The current version will always be available within the Apps and at <https://propairflight.com>, and we will let you know about any significant changes in the App or by email.

13 CONTACT US

If you have any questions about this policy or how we handle your data, please contact us:

- / By email: office@propairflight.com
- / By post: Propair Flight Ltd., Malom Udvar Offices, Soroksári street 48, 1095 Budapest, Hungary
- / Via our website: <https://propairflight.com>

