

JOINAIR HELICOPTERS

PRIVACY POLICY

Effective Date: August 11, 2026

Location: 1-8409 Lockheed Place Chilliwack BC

Contact: info@joinairhelicopters.ca

JoinAir Helicopters is committed to protecting the privacy and security of the personal information of our students, prospective students, and all individuals who interact with us. We collect, use, and disclose personal information responsibly and in accordance with applicable privacy legislation, including British Columbia's *Personal Information Protection Act* (PIPA) and, where applicable, Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA). This Privacy Policy explains what information we collect, why we collect it, how it is used and protected, and what rights individuals have with respect to their personal information.

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Section 1 — About This Policy

This Privacy Policy applies to all personal information collected, used, or disclosed by JoinAir Helicopters in the course of operating our flight training school. It applies to:

- Prospective students who submit inquiries through any channel, including our website, social media, or in person;
- Enrolled students participating in ground school or flight training programs;
- Visitors to the JoinAir Helicopters website; and
- Any individual who submits personal information to JoinAir Helicopters by any means, including email, telephone, or paper forms.

This policy is designed for dual use: it is published on the JoinAir Helicopters website for public accessibility and is also included in the student handbook and enrollment package provided to all students at the time of registration. Both versions carry the same legal force and reflect the same commitments made by JoinAir Helicopters regarding the handling of personal information.

By submitting information to JoinAir Helicopters or by enrolling in one of our programs, individuals acknowledge that their personal information will be handled in accordance with this policy.

Section 2 — Applicable Legislation

JoinAir Helicopters is based in Chilliwack, British Columbia, Canada. Our primary privacy obligations are governed by the following legislation:

2.1 BC Personal Information Protection Act (PIPA)

PIPA is the primary provincial law governing how private-sector organizations in British Columbia collect, use, and disclose personal information. JoinAir Helicopters complies fully with PIPA in all aspects of its operations involving personal information.

2.2 Personal Information Protection and Electronic Documents Act (PIPEDA)

PIPEDA applies to the collection, use, and disclosure of personal information in the course of commercial activities, including cross-border data flows. Where personal information is transferred or accessed across provincial or national boundaries — for example, through cloud-based services or communications with federal regulatory bodies — PIPEDA applies in addition to PIPA.

2.3 Transport Canada Civil Aviation Regulations (CARs)

As a flight training school, JoinAir Helicopters is subject to Transport Canada's Civil Aviation Regulations, which impose specific obligations regarding the collection, maintenance, and retention of student training records. These regulatory requirements take precedence over individual privacy preferences in certain circumstances, as described further in this policy.

2.4 Fair Information Principles

Both PIPA and PIPEDA are built upon the 10 fair information principles originally established in the Canadian Standards Association's Model Code for the Protection of Personal Information. JoinAir Helicopters' privacy practices are guided by these principles, which include: accountability, identifying purposes, consent, limiting collection, limiting use and disclosure, accuracy, safeguards, openness, individual access, and challenging compliance. These principles form the foundation of our approach to privacy and inform every aspect of this policy.

Section 3 — Information We Collect

JoinAir Helicopters collects only the personal information that is reasonably necessary for the purposes identified in this policy. The following subsections describe the categories of information we collect and the means by which we collect them.

3.1 Information Collected via Meta Lead Forms

JoinAir Helicopters uses Meta (Facebook and Instagram) advertising, including Meta lead generation forms, to connect with prospective students. When an individual submits a Meta lead form, the following information may be collected and subsequently shared with JoinAir Helicopters by Meta:

- Full name;
- Email address;
- Phone number; and
- General inquiry details or questions provided in the form.

Please see Section 6 of this policy for further details regarding Meta lead forms and Meta's own privacy practices.

3.2 Information Collected via Website Inquiries

Individuals who contact JoinAir Helicopters through the website contact form may provide the following information:

- Full name;
- Email address;
- Phone number; and
- Message content (the text of the inquiry).

In addition, the JoinAir Helicopters website may automatically collect certain technical and usage information, including:

- IP address;
- Browser type and version;
- Pages visited and time spent on those pages; and
- Cookie data used for general analytics purposes.

Please see Section 14 of this policy for further information regarding cookies and analytics.

3.3 Enrollment Documentation

At the time of enrollment, JoinAir Helicopters collects documentation and information required to establish and administer the student's training program, including:

- Legal name, date of birth, and government-issued identification details (required for regulatory verification and Transport Canada compliance);
- Emergency contact information (name, relationship, and phone number);
- Medical declaration information relevant to flight training eligibility;
- Previous aviation training, licences, or ratings held; and
- Payment and billing information for the processing of tuition and related fees.

3.4 Student Training Records

Throughout the course of training, JoinAir Helicopters maintains detailed records as required by Transport Canada Civil Aviation Regulations, including:

- Flight hours logged and aircraft type(s) flown;
- Ground school attendance, lesson progress, and assessment results;
- Instructor notes, evaluations, and stage check results;
- Transport Canada written examination results and PSTAR scores;
- Radio communication records where applicable; and
- Aircraft logbook endorsements and sign-offs issued by authorized instructors.

3.5 Administrative Communications

JoinAir Helicopters retains records of communications exchanged during the enrollment and training process, which may include:

- Emails sent to and received from students and prospective students;
 - Notes from telephone conversations where relevant to the student's file; and
 - Text or messaging communications relating to scheduling, operational notices, or training matters.
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Section 4 — How We Use Your Information

JoinAir Helicopters uses personal information only for purposes that a reasonable person would consider appropriate in the circumstances, and only for the purposes for which it was collected or to which the individual has consented. Specific purposes include:

- **Processing inquiries and enrollment applications:** To respond to prospective student inquiries, assess eligibility, and process enrollment documentation;
- **Delivering flight training programs:** To schedule and conduct ground school and flight training lessons, track student progress, and issue appropriate endorsements and certifications;
- **Maintaining regulatory training records:** To fulfill the record-keeping obligations imposed by Transport Canada Civil Aviation Regulations, including the maintenance of student logbooks, training records, and examination results;
- **Communicating with students:** To send scheduling confirmations, training updates, operational notices, and other information relevant to the student's program;
- **Processing payments:** To collect and process tuition payments, issue receipts, and manage billing records;
- **Meeting legal and regulatory obligations:** To comply with applicable laws, regulations, and lawful requests from government authorities, including Transport Canada;
- **Improving services:** To evaluate and improve our training programs, facilities, and customer experience, using aggregated or anonymized data where possible;
- **Marketing to prospective students:** To inform prospective students of our programs, promotions, and updates, where the individual has provided express consent to receive such communications; and
- **Responding to safety or emergency situations:** To contact emergency contacts or relevant authorities in the event of a safety incident or emergency involving a student.

Section 5 — Consent

5.1 How Consent Is Obtained

JoinAir Helicopters obtains consent for the collection, use, and disclosure of personal information in a manner appropriate to the sensitivity of the information and the nature of the interaction. Consent may be obtained at the inquiry stage, at the time of enrollment, or separately for marketing communications.

5.2 Implied Consent

When an individual voluntarily submits a contact form, inquiry email, or Meta lead form, implied consent is obtained for JoinAir Helicopters to use that information to respond to the inquiry. Implied consent is appropriate for low-sensitivity, purpose-limited uses that would be expected by the individual at the time of submission.

5.3 Express Consent

Express consent — a clear, affirmative indication of agreement — is required for:

- The collection and use of sensitive personal information at enrollment (including medical information and government-issued identification details); and
- The sending of marketing or promotional communications beyond the scope of the immediate inquiry.

Express consent is obtained through signed enrollment documentation and, for marketing communications, through a separate opt-in mechanism.

5.4 Withdrawal of Consent

Individuals may withdraw their consent for non-essential uses of their personal information at any time by contacting JoinAir Helicopters at joinairhelicopters@gmail.com. Please note that withdrawal of consent:

- Does not operate retroactively and does not affect any use or disclosure already made with prior consent;
- May limit JoinAir Helicopters' ability to continue providing certain services; and
- Does not apply to personal information that JoinAir Helicopters is required by law to retain, including student training records mandated by Transport Canada Civil Aviation Regulations.

Section 6 — Meta Lead Forms & Third-Party Platforms

JoinAir Helicopters uses Meta Platforms Inc.'s lead generation advertising tools on Facebook and Instagram to connect with individuals who may be interested in helicopter flight training. The following applies to the use of Meta lead forms:

6.1 Data Collection by Meta

When a prospective student submits a Meta lead form, the information entered (name, email address, phone number, and any responses to form questions) is first collected by Meta under Meta's own Privacy Policy and Terms of Service. Meta then shares this information with JoinAir Helicopters as the advertising party.

6.2 JoinAir Helicopters' Use of Meta Lead Form Data

JoinAir Helicopters receives and stores lead form data for the sole purpose of following up on the inquiry — that is, to respond to the prospective student's interest in our programs. This data is handled in accordance with this Privacy Policy and is not used for any purpose beyond inquiry follow-up and, where the individual has provided express consent, subsequent marketing communications.

6.3 Meta's Privacy Policy

Individuals who submit information through a Meta lead form are encouraged to review Meta's Privacy Policy, which governs how Meta collects, uses, and retains data on its own platforms. Meta's Privacy Policy is available at: meta.com/privacy.

6.4 No Sale of Data

JoinAir Helicopters does not sell, rent, or trade personal information received through Meta lead forms or any other channel to unrelated third parties for any purpose.

Section 7 — Third-Party Services

In the course of operating our flight training school, JoinAir Helicopters may share personal information with certain third parties where necessary. JoinAir Helicopters does not sell personal information. Third parties receive only the minimum information necessary for the specific purpose, and are expected to comply with all applicable privacy legislation.

Third Party	Purpose	Nature of Data Shared
Transport Canada	Mandatory regulatory reporting of student training records, licence applications, and examination results	Training records, examination scores, personal identification details as required by CARs
Meta Platforms Inc.	Lead form advertising platform; facilitates submission of inquiries from prospective students	Contact and inquiry data (see Section 6)
Payment Processors	Processing of tuition payments and related fees	Payment and billing information; subject to the payment processor's own security standards (e.g., PCI-DSS)
Google (Gmail / Google Workspace)	Administrative email communications and cloud document storage	Email content and associated attachments stored within Google's infrastructure; subject to Google's Privacy Policy

JoinAir Helicopters takes reasonable steps to ensure that third parties to whom personal information is disclosed provide adequate privacy and security protections consistent with applicable law.

Section 8 — Storage and Security

8.1 Security Measures

JoinAir Helicopters uses industry-standard security measures to protect personal information against unauthorized access, disclosure, alteration, or destruction. These measures include:

- Password controls and access restrictions on electronic systems containing personal information;
- Encryption where applicable for the transmission and storage of sensitive data;

- Limited access to personal information — only authorized instructors and administrative staff with a legitimate need to access information may do so; and
- Physical security measures, including locked storage for paper-based records and enrollment documents.

8.2 Staff Obligations

All staff members of JoinAir Helicopters who have access to personal information are informed of their privacy obligations and are expected to handle personal information with care, discretion, and in accordance with this policy.

8.3 Data Breach Response

In the event of a breach of security involving personal information, JoinAir Helicopters will act promptly to contain the breach, assess the risk of harm, and notify affected individuals and the relevant authority (the Office of the Information and Privacy Commissioner for BC) as required under BC's PIPA and any other applicable legislation.

Section 9 — Student Records

9.1 Regulatory Requirement

Student training records are maintained by JoinAir Helicopters in compliance with Transport Canada Civil Aviation Regulations (CARs). These regulations impose specific requirements regarding what records must be kept, in what form, and for how long. JoinAir Helicopters' record-keeping obligations under these regulations take precedence over a student's request to delete or withdraw personal information that forms part of a mandatory training record.

9.2 Contents of Student Records

Student training records maintained by JoinAir Helicopters may include:

- Pilot logbook records and flight hour summaries;
- Ground school attendance and lesson completion records;
- Written examination results, including Transport Canada PSTAR results;

- Medical information relevant to flight eligibility;
- Copies of government-issued identification and licence documentation; and
- Instructor endorsements and stage check sign-offs.
- Daily Flight Reports

9.3 Access Controls

Access to student training records is restricted to authorized instructors and administrative staff of JoinAir Helicopters who have a legitimate training or administrative need to review the records. Records are not shared with third parties except as required by Transport Canada regulations or as otherwise described in this policy.

9.4 Student Right of Access

Students have the right to access their own training records held by JoinAir Helicopters. Requests for access must be submitted in writing to joinairhelicopters@gmail.com. JoinAir Helicopters will respond to access requests within 30 days of receipt, subject to any limitations imposed by applicable law.

Section 10 — Communications

10.1 Operational Communications

JoinAir Helicopters may contact students and prospective students via email, telephone, or SMS for purposes directly related to the training relationship, including:

- Flight lesson and ground school scheduling and rescheduling;
- Notices regarding weather cancellations or operational changes;
- Updates regarding training progress, upcoming examinations, or administrative requirements; and
- Enrollment confirmations and payment receipts.

These communications are considered part of the service relationship and do not require separate marketing consent.

Section 11 — Data Retention

JoinAir Helicopters retains personal information only for as long as is necessary to fulfill the purposes for which it was collected, or as required by applicable law. The following retention guidelines apply:

Category of Information	Retention Period	Authority / Basis
Student training records (logbooks, examination results, endorsements)	Minimum 7 years from the last date of training, or as otherwise required by CARs	Transport Canada Civil Aviation Regulations
Enrollment and financial records (tuition payments, receipts)	Minimum 7 years	Income Tax Act (Canada) and applicable accounting requirements
Marketing inquiry data (no enrollment)	Up to 2 years from the date of last contact, then securely deleted	JoinAir Helicopters policy — proportionate retention
Website analytics and cookie data	As configured in applicable analytics tools; typically 12–26 months	JoinAir Helicopters policy
Administrative communications (email, SMS)	Duration of the training relationship plus 3 years, or as required by law	JoinAir Helicopters policy

Upon the expiry of the applicable retention period, personal information is securely destroyed or anonymized in a manner that prevents reconstruction or unauthorized use.

Section 12 — Your Rights: Access and Correction

Under BC's PIPA and PIPEDA, individuals have the following rights with respect to their personal information held by JoinAir Helicopters:

- **Right of Access:** To request access to their personal information held by JoinAir Helicopters, including information about how that information has been used or disclosed;
- **Right of Correction:** To request that inaccurate, incomplete, or outdated personal information be corrected or updated;
- **Right to Information:** To be informed of the purposes for which their personal information is collected, used, and disclosed; and

- **Right to Complain:** To file a complaint with JoinAir Helicopters, or with the relevant regulatory authority, if they believe their privacy rights have been violated.

12.1 How to Submit a Request

To exercise any of the above rights, individuals should submit a written request to:

Privacy Requests — JoinAir Helicopters

Email: **Info@joinairhelicopters.ca**

Subject line: "Privacy Request — [Your Name]"

Please describe the nature of your request clearly. We may require verification of your identity before processing the request.

JoinAir Helicopters will acknowledge receipt of the request and provide a substantive response within **30 calendar days**. If additional time is required in complex cases, we will notify the individual of the extension and the reasons for it.

Section 13 — Withdrawal of Consent

Individuals may withdraw their consent for any non-essential use or disclosure of their personal information at any time by submitting a written withdrawal request to **info@joinairhelicopters.ca**.

The following conditions apply to consent withdrawal:

- Withdrawal of consent does not operate retroactively and does not affect any collection, use, or disclosure of personal information that occurred prior to the withdrawal;
- Withdrawal of consent for certain uses may limit JoinAir Helicopters' ability to continue providing training or administrative services to the individual;

- Personal information that JoinAir Helicopters is legally required to retain — including student training records mandated by Transport Canada Civil Aviation Regulations — cannot be deleted upon consent withdrawal, regardless of the individual's request; and
 - Withdrawal of consent for marketing communications will be processed promptly and will not affect the delivery of operational or service-related communications during an active enrollment.
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Section 14 — Cookies and Website Analytics

14.1 Use of Cookies

The JoinAir Helicopters website may use cookies — small data files stored on a visitor's browser — to support website functionality and to understand how visitors interact with the site. Cookies used on the JoinAir Helicopters website fall into two categories:

- **Essential cookies:** Necessary for the basic operation of the website (e.g., maintaining session integrity). These cookies do not require consent and cannot be disabled without impairing website functionality.
- **Non-essential cookies:** Used for analytics, performance measurement, or advertising purposes. These cookies require the visitor's consent before being placed on their device.

14.2 Analytics Tools

JoinAir Helicopters may use third-party analytics tools, such as Google Analytics, to understand visitor behavior in aggregate, identify popular content, and improve website performance. Where such tools are used, they are configured to collect only anonymized or aggregated data where possible. Personally identifiable information is not collected through analytics without the visitor's express consent.

14.3 Managing Cookie Preferences

Visitors can manage or disable cookies at any time through their browser settings. Most browsers provide options to block cookies, delete existing cookies, or receive notification before a cookie is

stored. Please note that disabling certain cookies may affect the functionality of the JoinAir Helicopters website.

Section 15 — Changes to This Policy

JoinAir Helicopters may update or revise this Privacy Policy from time to time to reflect changes in our practices, applicable legislation, or regulatory requirements. The following procedures apply when this policy is updated:

- The revised policy will be posted on the JoinAir Helicopters website with a clearly visible updated effective date;
- For enrolled students, notice of any material changes to this policy will be provided by email to the address on file; and
- Continued use of JoinAir Helicopters' services after receiving notice of a material change will be deemed acceptance of the updated policy.

We encourage students and prospective students to review this policy periodically to stay informed of how their personal information is being protected. If you have questions about any updates to this policy, please contact us at joinairhelicopters@gmail.com.

Section 16 — Contact Information for Privacy Inquiries

All privacy-related questions, requests, or concerns should be directed to JoinAir Helicopters using the contact information below:

Privacy Officer — JoinAir Helicopters

Organization: JoinAir Helicopters

Location: 1-8409 Lockheed place Chilliwack bc

Email: info@joinairhelicopters.ca

JoinAir Helicopters is committed to resolving privacy concerns in a timely and respectful manner. If you are not satisfied with our response, or if you believe your privacy rights have been violated, you may contact the following independent regulatory authorities:

Authority	Jurisdiction	Website
Office of the Information and Privacy Commissioner for BC (OIPC BC)	British Columbia — PIPA complaints and inquiries	oipc.bc.ca
Office of the Privacy Commissioner of Canada (OPC)	Federal — PIPEDA complaints and inquiries	priv.gc.ca

JoinAir Helicopters | Chilliwack, British Columbia, Canada | info@joinairhelicopters.ca

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