

Privacy Policy

Solace Private Jet (“Solace”, “we”, “our”, or “us”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website, mobile application, or otherwise interact with our services (collectively, the “Site”).

By using the Site, you agree to the terms of this Privacy Policy.

You may request the deletion of your personal data at any time by contacting info@solaceprivatejet.com.

1. Information We Collect

We may collect the following categories of information:

- **Personal Information:** Name, email address, phone number, billing address, etc. Government ID or travel documentation (where required for private jet, helicopter, or empty leg flight bookings). Payment and billing information.
- **Usage Data:** Browser type, IP address, referring URLs, pages viewed, time on site, clicks, etc.
- **Device Information:** Device type, operating system, unique device identifiers.
- **Cookies and Tracking Technologies:** See our Cookies Policy for details.

2. How We Use Your Information

We use the information we collect for the following purposes:

- To provide and manage your charter bookings, specialized services, and concierge requests.
- To process payments and fulfill requests.
- To improve our website, fleet offerings, services, and marketing.
- To send transactional emails, newsletters, and promotional communications.
- To comply with legal obligations and prevent fraud.

3. Legal Basis for Processing (GDPR & KVKK)

For users in the European Economic Area (EEA) and Turkey, we process your data under the following legal bases in accordance with the **General Data Protection Regulation (GDPR)** and the **Turkish Personal Data Protection Law (KVKK)**:

- Your explicit consent.
- Performance of a contract (e.g., fulfilling your private aviation requests).
- Compliance with legal obligations.
- Our legitimate business interests (e.g., service improvement, fraud prevention).

4. Disclosure of Information

We may share your information with:

- Trusted third-party service providers (e.g., air operators, flight crews, payment processors, concierge partners).
- Legal authorities when required by law.
- Marketing or analytics providers (aggregated and anonymized where possible).
- In connection with a business transfer (e.g., merger, acquisition).
- Third-party AI platform providers that process user inputs to generate responses (as described below in “Third-Party AI Platform Processing”).

We **do not sell your personal data** as defined under the California Consumer Privacy Act (CCPA/CPRA).

5. Your Privacy Rights

a) GDPR & KVKK – EU/EEA and Turkey Residents You have the right to:

- Access, correct, or delete your personal data.
- Object to processing or request a restriction.
- Request data portability.
- Withdraw your consent at any time.

To exercise these rights, contact us at info@solaceprivatejet.com.

b) CCPA/CPRA – California Residents You have the right to:

- Know what personal information we collect and how it's used.
- Request deletion of your data.
- Opt out of data “sharing” or “selling”.
- Correct inaccurate information.
- Non-discrimination for exercising your rights.

To submit a request, email info@solaceprivatejet.com or call **+90 (532) 341 69 30**.

6. Children’s Privacy (COPPA)

We do not knowingly collect personal information from children under 13 years of age. If you are a parent or guardian and believe your child has provided us with personal data, please contact us immediately to have it removed.

7. Email Communications (CAN-SPAM Compliance)

If you receive marketing emails from Solace Private Jet:

- You may opt out at any time via the “unsubscribe” link in the email.
- We only send emails to users who opt in or have a business relationship with us.
- We honor unsubscribe requests promptly and do not send deceptive headers or content.

8. Data Security

We implement appropriate technical and organizational measures to protect your data. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

9. International Transfers

Your information may be processed in countries outside your jurisdiction, including Turkey and other global locations where our servers or aviation partners operate. Data protection laws may differ in these regions. We ensure adequate safeguards are in place where required by law.

10. Data Retention

We retain your information only as long as necessary to fulfill the purposes outlined in this policy and to comply with legal obligations. Retention periods vary depending on the type of data:

- **Conversational and AI interaction data:** Typically retained for a limited period (e.g., 30–90 days), unless required for service improvement or legal compliance.
- **Account information:** Retained while your account is active and for a reasonable period after closure.
- **Booking and transaction data:** Retained as required for legal, tax, and accounting purposes (e.g., 5–10 years depending on local laws).
- **Usage and analytics data:** Retained in aggregated or anonymized form where possible.
- **Marketing data:** Retained until you opt out or withdraw consent.

11. Third-Party Links

Our Site may contain links to third-party websites or services. We are not responsible for the privacy practices or content of those third parties.

12. Policy Updates

We may update this Privacy Policy from time to time. When we do, we will update the “Effective Date” above. Your continued use of the Site after any changes constitutes your acceptance of the revised policy.

13. Contact Us

If you have questions or concerns about this Privacy Policy or how we handle your personal data, contact us at:

Solace Private Jet Dikilitaş Mah. Otopark Çıkmazı Sk. No: 6 İç Kapı No: 4 Beşiktaş / İstanbul, Turkey Email: info@solaceprivatejet.com Phone: **+90 (532) 341 69 30**

14. Conversational and AI Interaction Data

When you interact with our Services through AI-powered interfaces, we may collect and process:

- Chat messages, prompts, and queries submitted by users.
- Responses generated by the AI system.
- Contextual information necessary to provide relevant responses.

We use this data to:

- Provide and improve AI-assisted aviation services.
- Respond to inquiries and facilitate charter bookings or concierge support.
- Enhance user experience and service quality.

Conversational data may be processed and temporarily stored by us and/or third-party AI platform providers. We do not sell this data and do not use it for unrelated marketing purposes without your consent.

15. Tool-Specific Data Collection

Depending on how you use our Services, we may collect additional data specific to certain features:

- **Contact Forms:** Message content, inquiry details, and contact information.
- **Fleet Browsing or Search:** Search queries, filters, and aircraft preferences.
- **Booking and Service Tools:** Travel details, passenger information, and specialized service selections (e.g., pet travel, catering, specific event packages).
- **Business Information Display:** Publicly available business or service-related details presented to users.

This information is collected and used solely to provide the requested functionality and improve service relevance.

16. Third-Party AI Platform Processing

Certain features of our Services may rely on third-party AI platforms. When you use these features:

- Your inputs (including personal data) may be processed by these third-party platforms.
- These platforms may process data under their own terms and privacy policies.
- We do not control how third-party platforms independently store, use, or retain data.

By using AI-powered features, you acknowledge and consent to such processing where applicable. We encourage users to review the privacy policies of any third-party AI platforms they interact with through our Services.

17. Data Deletion & User Rights

Users worldwide have the right to request the deletion of their personal data at any time, regardless of location. To request the deletion of your personal data, you may:

- Submit a request via email to **info@solaceprivatejet.com**

Your request should include sufficient information to verify your identity and specify the data you wish to have deleted. Upon receiving a valid request, we will:

- Confirm receipt of your request within 30 days (or sooner where required by law).
- Delete or anonymize your personal data from our systems, unless retention is required for legal, regulatory, or legitimate business purposes.
- Notify you once the deletion process is complete.

If certain data cannot be deleted (e.g., for legal compliance, fraud prevention, or accounting obligations), we will inform you accordingly. We may retain limited information necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

If you access our services through a third-party platform (e.g., Google, Apple), you may request data deletion directly through that platform or by contacting us at **info@solaceprivatejet.com**. Specific instructions for Google users are provided below.

18. Google Account Data Deletion Instructions

If you have used your Google account to access Solace Private Jet, you can revoke access and request the deletion of your data associated with Google by following these steps:

- Go to your Google Account (myaccount.google.com).
- Click on **Security** in the left navigation panel.
- Scroll down to **Your connections to third-party apps & services**.
- Select **Solace Private Jet**.
- Click **Delete all connections you have with Solace Private Jet** (or "Remove Access").

Alternatively, you can request data deletion directly by contacting us: Email: **info@solaceprivatejet.com**