



HEICO



To: All HEICO Subsidiaries
From: HEICO Legal & HEICO IT
Date: April 12, 2024

This memorandum outlines internet privacy consent requirements which must be implemented across all HEICO Corporation subsidiaries' websites.

Within ten (10) business days of receiving this memorandum, all HEICO subsidiaries are expected to implement a compliant internet cookie banner and separate cookie and privacy policies. The banner and policies must satisfy the requirements of the European Union's General Data Protection Regulation (GDPR), the United Kingdom's Privacy and Electronics Communications Directive (PEC), California's Consumer Privacy Act (CCPA), as well as similar regulations enacted in various other states and countries (collectively, the "Data Privacy Regulations"), and must also be readily adaptable to meet changes to existing or new data privacy legislative landscape. Tom Wilson (twilson@heico.com) and Eliana Beckinsale (ezerpa@heico.com) with HEICO IT are ready and willing to assist with implementing the requirements set forth in this memorandum, and you are strongly urged to utilize their assistance.

1. Cookie Banners

All HEICO subsidiaries must ensure that their websites have compliant cookie banners. The necessary elements of a cookie banner vary depending on the applicable law. Data Privacy Regulations proscribe differing requirements, thus, where an internet user is physically located when accessing your website will prompt different cookie banner and related data privacy requirements for your website and privacy obligations for the company.

To ease the burden of compliance with these regulatory regimes and separate requirements, HEICO strongly recommends that you enroll in and implement a cookie consent solution. These products generate internet script (code) to implement within your websites and are dynamic to adapt to the location of the user. HEICO IT has determined that CookieYes© is one of the best off-the-shelf products to meet our data privacy compliance obligations. HEICO IT has purchased a subscription for the cookie banner(s) used on <https://www.heico.com/> from CookieYes© which is live and accessible. We suggest you purchase a "Pro" subscription for \$20/month to [CookieYes Cookie Consent Solution \(https://www.cookieyes.com/\)](https://www.cookieyes.com/) as the Free or Basic versions do not include a Global Privacy Control integration, which is necessary to comply with the CCPA.

2. Cookie Policy & Privacy Policy

In order to ensure compliance with the Data Privacy Regulations, your website must also include a stand-alone cookie policy and privacy policy which is substantially similar to the policies on HEICO's website (Cookie Policy: <https://heico.com/cookie-policy/>); Privacy Policy: <https://heico.com/privacy-policy/>). For both the Cookie Policy and Privacy Policy, you should use the templates attached to this memorandum and fill in the highlighted blanks as applicable for your company/website. Tom and Eliana can assist you with ensuring that the CookieYes or similar tool you are expected to purchase auto-populates the charts indicating the types of cookies your website may use.

Please confirm compliance with the requirements set forth herein to Tom and Eliana.



Cookie Policy



- [What are cookies and why do we use them?](#)
- [Withdrawal and management of your consent](#)
- [How to contact us](#)

This website ([\[redacted\]](#)) uses cookies and similar technologies (“cookies”). This cookie policy explains the cookies we use and the purposes for which we use them. We may change the cookies we use from time to time and, if so, we will update this policy accordingly. You can revisit this page at any time if you wish to keep yourself informed.

You will find more information on our personal data management and privacy policy on the Privacy Policy page ([\[redacted\]](#)).

What are cookies and why do we use them?

Cookies are text files containing small amounts of information that are placed on your computer’s hard drive when you visit certain websites and generally serve different purposes such as the proper functioning of this website, memorizing your browsing settings, displaying advertisements corresponding to your browsing preferences and habits, statistical analysis of visits, and tracking user interaction. “First-party cookies” are set by the website owner or publisher. “Third-party cookies” are any other cookies set by parties other than the website owner. Third-party cookies enable third-party features or functionality to be provided on or through the website (e.g., advertising, interactive content, and certain analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites

The installation of most cookies will result in the collection and storage of personal data concerning you, such as information concerning your electronic device, your connection to individual accounts, your behavior on the site visit to the site (date, time and duration of connection, pages visited), your IP address (a unique identifier that certain electronic devices used to identify and communicate with each other on the Internet), information about your devices’ operating system, mobile carrier, and information from which your regional geographic location information can be identified. Cookies collect information during their duration, which can last for a single browsing session or longer, for example two years.

The specific types of first and third-party cookies utilized throughout Website, the purposes they perform, and the varied duration of those cookies are described below:

Necessary

Necessary cookies are required to enable the basic features of this site, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

Cookie	Duration	Description



Cookie	Duration	Description
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Statistical/Analytical

Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.

[REDACTED]	[REDACTED]
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Cookie	Duration	Description
[REDACTED]	[REDACTED]	[REDACTED]

Withdrawal and management of your consent

You have the right to change and/or withdraw your consent to the use of cookies at any time through our Cookie Preferences Management Tool, which permits you to choose to “Accept All” cookies, “Refuse All” non-essential cookies, or to “Choose” which cookies you permit to access your device.

In addition to the Cookie Preferences Management Tool on this site ([REDACTED]) most browser privacy settings (through the Help function) will allow you to delete cookies, stop accepting new cookies, and to be notified when new cookies are set. The website www.aboutcookies.org contains additional detailed guidance on how to do this on a wide variety of browsers. However, if you block all cookies, you may be unable to access certain parts or functions of our website.

How to contact us

For any questions about this Cookie Policy or our privacy practices, email heicoprivacy@heico.com or write to HEICO Corporation, 3000 Taft Street, Hollywood, FL 33021, USA, Attn: Privacy Request.



Privacy Policy



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This privacy notice was last updated on April 9, 2024.

Introduction

This Privacy Notice explains how HEICO Corporation, its subsidiaries, and affiliates, including [REDACTED] (also referred to as "we," "us," "our," or "HEICO") uses any personal information we collect from or about you, through our interactions with you, and through our products and services, including this website.

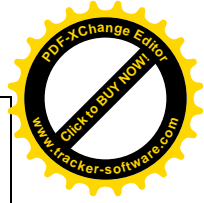
Our Privacy Notice applies to all of the services offered by HEICO and products and services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

By accessing or using this website, you are consenting to the collection, use and disclosure of your information in accordance with this Privacy Policy. If you do not consent to the same, please do not access or use this website. We may modify this Privacy Policy at any time and therefore recommend that you periodically review this page.

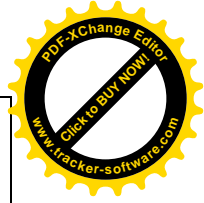
Personal information we collect and purposes

We collect information about you to effectively operate our website, to provide information to you about our products and services, and in certain cases, may help to manage our relationship with you. We may also collect personal information when you voluntarily submit it to us, like through a website "contact us" form or e-mail. We may collect payment information that you provide to pay for and use our products and services. We may also collect certain information from public sources or by automated means when you visit our website, such as the number of visitors and pages accessed. By collecting this information, we learn how to best tailor the websites to our visitors. We collect this information through various means such as "cookies," "web beacons" and IP addresses. Please see our Cookie Policy for further information on certain data collection and tracking technologies we may use.

The table below explains the categories of information we collect and the purposes for which we use them. Please note that we may use any or all of this information to comply with the law, detect or prevent fraud, and to defend our legal rights.



Categories of personal information we collect	Purposes of use
Business contact information For example: company name, your name, email address, and job title.	<ul style="list-style-type: none">• Build and manage business relationships• Provide goods and services• Send you marketing communications
Contact information and account registration For example: name, email, postal address, telephone number, account user name and password, business contact information, and any information you may provide to us at an event or in person	<ul style="list-style-type: none">• Provide goods and services• Creating and managing user account• Personalize your experience• Send you marketing communications• Build and manage business-to-business relationships• Protect our services and properties
Transactional For example: payment details, purchase history, delivery address	<ul style="list-style-type: none">• Provide goods and services• Processing payment• Personalize your experience• Send you marketing communications• Build and manage business-to-business relationships• Protect our services and properties
Research and feedback For example: comments that you send us through online forms and social media platforms, by email, over the phone, by mail, or in surveys.	<ul style="list-style-type: none">• Provide goods and services• Personalize your experience• Build and manage business-to-business relationships
Employment information Employment status, employment history, education history, curriculum vitae, information about security clearance, where necessary, your current salary, and other personal information submitted by job applicants	<ul style="list-style-type: none">• Provide goods and services• Process employment applications
Audio and video For example: audio recordings of a customer service call or security video footage if you visit one of our properties.	<ul style="list-style-type: none">• Provide goods and services• Protect our services and properties



Categories of personal information we collect	Purposes of use
Device information and identifiers For example: IP address, cookie IDs, browser type and language, operating system, platform type, device type, and advertising and app identifiers.	<ul style="list-style-type: none">• Provide goods and services• Operate and improve our website• Protect our services and properties

Disclosure of information to third parties

We will not transfer your personal information to any third party without seeking your consent, except in the following limited circumstances:

- Analytics
- Ad service
- Marketing agencies
- Payment recovery services
- Data collection & processing
- Affiliates
- Legally required disclosures.

A third-party's use of the personal information we transfer to them is only permissible for the purpose for which it was transferred. This information sharing may help us respond to your inquiry, manage our relationship with you, and to comply with legal obligations. We do not rent or sell personal information to third parties.

We may also disclose your personal information for the following: (1) to comply with applicable law, regulation, court order or other legal process; (2) to enforce your agreements with us, including this Privacy Policy; and/or (3) to respond to claims that your use of the website violates any third-party rights. If the website or our company is acquired by or merged with another company, your information will be one of the assets that is transferred to the new owner.

Data security, integrity, and retention

We are committed to maintaining the security, integrity, and confidentiality of your information. We have implemented technical, administrative, and physical security measures that are designed to protect your information from unauthorized access, disclosure, use, and modification. Please be aware that no security measures are perfect or impenetrable and we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this privacy notice, including providing you the products and services you have requested, unless a longer retention period is required or permitted by law.

Social media plug-ins

Our website may feature plug-ins for easy sharing and following our social media pages including LinkedIn, Twitter, and Facebook. Being on our website does not automatically result in sharing data on these social media networks. These plugins remain inactive (idle) until clicked upon. Once



clicked upon, you will be taken to the social media site, with their own privacy statements (which you are recommended to read).

Third party links & use of your information

Our website may contain links to other websites that we do not operate. This Privacy Policy does not address the privacy policy and other practice of any third parties, including any third party operating any website or services that may be accessible via a link of this website. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party site or services.

International (cross-border) transfers of personal data

HEICO operates on a global basis. Accordingly, we may transfer the personal information we collect to other countries where we do business, which may not have the same data protection laws as the country in which you originally provided the data. We will comply with applicable legal requirements by providing adequate protection for the transfer of personal information.

How to exercise your data subject rights

If you would like to access, receive a copy, share (port) to another entity, review, update, rectify, restrict, and/or delete any personal information or data we hold about you, withdraw any consent you provided to us to process your data, or exercise any other data subject right available to you under, email heicoprivacy@heico.com or write HEICO Corporation, 3000 Taft Street, Hollywood, FL 33021, USA, Attn: Privacy Request.

In order to comply with your request, we may ask you to verify your identity and/or provide additional details or descriptions related to your request. We will respond to you as quickly as possible and in accordance with applicable law.

Do note that if you do not allow us to collect or process the required personal information or withdraw the consent to process the same for the required purposes, you may not be able to access or use the services for which your information was sought.

California residents

California residents have specific rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA) (the “California Acts”). For more information and to exercise your rights, please see the section below titled “The California Acts.”

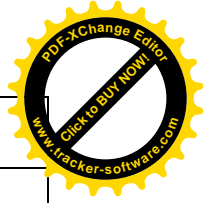
The California Acts

Under the California Acts, California residents have certain rights regarding the personal information that businesses have about them. This includes the rights to request access or deletion of your personal information, as well as the right to direct a business to stop selling your personal information.

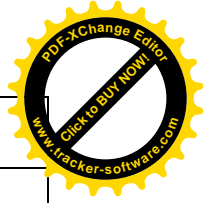
Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. In particular, we may have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet	YES



Category	Examples	Collected
	Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES



Category	Examples	Collected
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the California Acts.

With Whom We Share Your Personal Information

In limited circumstances, we may disclose your personal information to a third party for a business purpose.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.



Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information

Category E: Biometric Information.

Category G: Geolocation Data.

Category H: Sensory Data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

The Right to Opt-out of Sale

You have the right to direct us to not sell your personal information; however, we may retain information as needed in order to comply with legal obligations, enforce agreements, and resolve disputes.

With respect to cookies, you can always customize your settings at any time.

Right to Request Disclosure

You have the right to request disclosure about what categories of personal information we have disclosed for a business purpose and the categories of third parties to whom the personal information was sold or disclosed. Additionally, you have the right to request disclosure of specific pieces of information. Below is a full list of the information that you can include in your request.

- The categories of personal information that we have collected about you
- The categories of sources from which we have collected the personal information
- The business or commercial purpose for collecting or selling the personal information
- The categories of third parties with whom we share personal information
- The specific pieces of personal information we have collected about you
- The categories of personal information that we disclosed about you for a business purpose
- The categories of personal information that we have sold about you, as well as the categories of third parties to whom we sold the information

Right to Request Deletion

You have the right to request that we delete any personal information about you that we have collected from you. Please note that we may retain information as needed in order to comply with legal obligations, enforce agreements, and resolve disputes.



The Right to Non-Discrimination

We will not discriminate against you (e.g., through denying goods or services, or providing a different level or quality of goods or services) for exercising any of the rights afforded to you.

Contact Information

If you are a California resident and would like to exercise your rights under the CCPA, email: heicoprivacy@heico.com or write HEICO Corporation, 3000 Taft Street, Hollywood, FL 33021, USA, Attn: Privacy Request.

Please include a detailed description of the specific content or information you wish to access, review, update, rectify, and/or delete. In order to comply with your request, we may ask you to verify your identity. We will respond to you as quickly as possible

Children's privacy

We do not intentionally collect information on anyone under the age of 13.

Changes to our privacy notice

We keep our privacy notice under regular review and we will place any updates on this web page. The date of the last update is posted at the top of this page. You are responsible for periodically reviewing this notice

How to contact us

For any questions about this Privacy Notice or our privacy practices, email heicoprivacy@heico.com or write HEICO Corporation, 3000 Taft Street, Hollywood, FL 33021, USA, Attn: Privacy Request.