



# Sky Compliance Solutions

Trading as Sky Comp Tech | Compliance & Operations Excellence

## Privacy Policy

*Effective date: February 1, 2026*

Sky Compliance Solutions, trading as "SkyComp Tech" ("we", "us", "our"), provides enterprise compliance, operations, learning management, and business management software to aviation, financial services, and general business clients across Africa, including the Operations Control Center (OCC) platform, Fidel LMS, MantisQ, KAMO (MRO) and any other solutions we develop now or in the future (collectively, the "Services"). This Privacy Policy explains how we collect, use, disclose, and protect personal information when you visit our website, use our Services, or otherwise interact with us. By accessing our website or using our Services, you agree to the collection and use of information as described in this Policy.

### 1. Information We Collect

#### 1.1 Information you provide directly

- Contact details submitted through our website contact form or by email, such as your name, email address, company name, phone number, and message content.
- Account and profile information when you or your organization registers to use one of our Services, such as name, job title, employer, and login credentials.
- Operational, compliance, training, scheduling, or financial information that your organization inputs or uploads within a Service, for example flight and crew data in the OCC platform, learner records in Fidel LMS, or loan and client records in MantisQ.
- Correspondence you have with us, including support requests and feedback.

#### 1.2 Information collected automatically

- Standard technical information collected when you visit our website, such as IP address, browser type, device type, and pages visited, through standard web server logs.
- Cookies and similar technologies used for basic website functionality, described further in Section 6.

#### 1.3 Information from client organizations

Where our Services are used by a business client, such as an airline, training school, lender, or franchise operator, that client organization may input personal data about its own staff, students, customers, or members into the Services. In these cases, the client organization is the data controller for that information, and we act as a data processor on its behalf in accordance with our service agreement with that client.

### 2. How We Use Information

We use the information we collect to:

- Provide, operate, maintain, and improve our website and Services;
- Create and manage accounts and provide client support;

- Communicate with you about your account, inquiries, or our Services;
- Process transactions and fulfil contractual obligations with our clients;
- Monitor and analyze usage trends to improve functionality, security, and performance;
- Detect, investigate, and prevent fraudulent, unauthorized, or illegal activity;
- Comply with applicable legal, regulatory, and contractual obligations, including aviation and financial sector regulatory requirements where relevant; and
- Send you information about our Services where you have agreed to receive it, or where otherwise permitted by law. You may opt out of non-essential communications at any time.

### **3. How We Share Information**

We do not sell personal information. We may share information in the following circumstances:

- With employees, contractors, and service providers who need access to perform work on our behalf, such as cloud hosting providers, under confidentiality obligations;
- With a client organization's own authorized administrators, where the information relates to their staff, students, or customers using our Services under that client's account;
- With professional advisors, such as lawyers and auditors, where necessary;
- With regulators, law enforcement, or other parties where required by law, legal process, or to protect the rights, property, or safety of Sky Compliance Solutions, our clients, or others;
- In connection with a merger, acquisition, financing, or sale of business assets, subject to confidentiality arrangements; and
- With your consent, or at your direction.

### **4. Data Security**

We implement reasonable technical, administrative, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, and destruction, including encrypted data transmission, access controls, and staff confidentiality obligations. Further detail on our security practices is set out in our separate Security Policy. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

### **5. Data Retention**

We retain personal information for as long as necessary to provide the Services, fulfil the purposes described in this Policy, and comply with our legal and contractual obligations. Retention periods for data submitted within a client organization's use of our Services are generally determined by our agreement with that client. When information is no longer needed, we take reasonable steps to securely delete or anonymize it.

### **6. Cookies and Similar Technologies**

Our website uses a limited number of cookies and similar technologies necessary for core functionality, such as remembering navigation preferences, and to load third-party resources such as web fonts. We do not currently use third-party advertising cookies. You can control cookies through your browser settings; disabling cookies may affect some website functionality.

## **7. Your Rights**

Depending on your location and applicable law, you may have rights to access, correct, delete, or request a copy of your personal information, to object to or restrict certain processing, and to withdraw consent where processing is based on consent. To exercise these rights, contact us using the details in the "Contact Us" section below. If your data was submitted to us by a client organization, such as your employer or training provider, we may direct your request to that organization, as they control the data.

## **8. Children's Privacy**

Our website and Services are intended for business use and are not directed to children. We do not knowingly collect personal information from children. Where Fidel LMS or a similar training solution is used by an educational institution to manage learner records, that data is provided and controlled by the institution, which is responsible for obtaining any necessary consents.

## **9. International Data Transfers**

We are based in Uganda and primarily process information within Uganda and the East African region. Where data is transferred to or processed in other countries, for example through cloud infrastructure providers, we take reasonable steps to ensure it receives a level of protection consistent with this Policy.

## **10. Changes to This Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal, operational, or regulatory reasons. We will post the updated Policy on our website with a revised effective date. Material changes will be communicated to registered clients where appropriate.

## **Contact Us**

Questions about this Privacy Policy can be sent to:

**Sky Compliance Solutions (SkyComp Tech)**

Email: [info@skycomptech.com](mailto:info@skycomptech.com)

Governing jurisdiction: Republic of Uganda