

Isar Aerospace Privacy Policy

1. What information is contained in this Policy?

This Privacy Policy (**'Policy'**) describes how Isar Aerospace collects, uses, accesses or otherwise processes personal data relating to you (**'Data'**), as well as information about your rights and how to exercise your rights in relation to such processing. We may amend this Policy unilaterally from time to time. Any such amendments will be effective immediately upon publication. Please visit our website at www.isaraerospace.com (**'Website'**) regularly for the latest version of this Policy.

Please note that we process Data in accordance with applicable Data protection laws, including the General Data Protection Regulation (2016/679) (**'GDPR'**).

2. Who is your Data Controller?

Your Data Controller is **Isar Aerospace SE**, registered under number 290907, with its address at Caroline-Herschel-Straße 2, 85521 Ottobrunn, Germany.

Additionally, if you act as a representative of a business partner entering into a contract, apply for a job position, visit premises under CCTV surveillance, or otherwise establish a relationship with another company within the Isar Group, that respective company will also act as your Data Controller:

- **Name:** Isar Aerospace France SAS
Registration number: 920283116
Address: 36 Route de Lorrez le Bocage,
77710 Nanteau-sur-Lunain, France
- **Name:** Isar Aerospace Sweden AB
Registration number: 559305-8554
Address: Tapparegatan 3A 981 37
Kiruna Sweden
- **Name:** Isar Aerospace Norway AS
Registration number: 927 020 599
Address: Sjøgata 26A, 8480 Andenes,
Norway
- **Name:** Isar Aerospace US Inc
Registration number: 1235466
Address: 21828 Wingfoot Ct.
Broadlands VA 20148 USA

3. Purposes and legal basis of processing, categories of data concerned

3.1. Concluding and executing agreements

To establish, manage, and fulfill contractual obligations with our customers, service providers, vendors, suppliers, and other business partners, it is necessary to process their data (if they are natural persons) or the data of their representatives (if they are legal entities). This includes, for example, exchanging information necessary for the negotiation, formation, and execution of contracts, as well as maintaining ongoing communication and cooperation throughout the business relationship.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
<ul style="list-style-type: none"> • Contract (Art. 6(1)(b) of the GDPR) • Legitimate interest in concluding and executing agreements with business partners (Art. 6(1)(f) of the GDPR) 	Name and surname, job title, contact information (telephone number, email address), company affiliation, position within the company, signature, communications, and any other information necessary for contract negotiation, execution, and management.	Yes. It is a requirement of the contract and the law. If you do not provide this Data, Isar Aerospace will not be able to conclude and perform a contract with you

3.2. Security and operations: CCTV & access control

To ensure security of the company's property and personnel, investigate incidents, when necessary, ensure compliance, conduct manufacturing operations such as launch vehicle and its components manufacturing, testing and assembly and other related operations, Isar Aerospace conducts video surveillance at the following locations:

- **Production Site in Germany:** Finsinger Feld 9, 85521 Ottobrunn, Germany (gates to the territory, entrance to and surrounding of the office building, occasionally inside the testing container);
- **Engine subsystems testing site in Germany:** Kolbersberg 102 84571 Reischach Germany (gates to the territory, territory perimeter, testing site and inside of testing containers) (including occasional sound recording);
- **Office building in Germany:** Caroline-Herschel-Straße 2 and 4, 85521 Ottobrunn Germany (entrance to the office building);
- **Launch Site in Norway:** Nordmelaveien 769, 8489 Nordmela, Norway (gates to the territory, territory perimeter, Launch Pad, and inside the Assembly, Integration and Testing Hall) (including occasional sound recording);
- **Testing site in Sweden:** Isar Sweden AB/c/o Estrate Space Center 981 91 Jukkasjärvi Sweden (testing site and storage containers).

Isar Aerospace also controls access to its premises and territories using access badges, by registering visitors, and by monitoring vehicles that are entering and leaving Isar Aerospace facilities.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
Legitimate interest in ensuring security and conducting operations (Art. 6(1)(f) GDPR)	CCTV (video) data, occasional sound recordings, name, surname, date and time of entry and exit from premises and territories, date and time of access card activation, incident information, access rights and access bookings, photo for company ID, motor vehicle registration number(s)	No

3.3. Marketing activities

When you or the company you represent use our services, purchase our products, consent to receive marketing communications, or when Isar Aerospace has a legitimate interest in informing you about our services and products, we will process your Data as outlined below.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
<ul style="list-style-type: none"> • Consent (Art. 6(1)(a) of GDPR) • Legitimate interest in carrying out direct marketing activities (Art. 6(1)(f) of GDPR) • Customer relationship: <ul style="list-style-type: none"> ▫ Germany: Art. 7(3) of the Act against Unfair Competition ▫ France: Art. L34-5 of the Postal and Electronic Communications Code ▫ Sweden: Chapter 19 of the Swedish Marketing Act ▫ Norway: Section 15 of the Marketing Control Act 	Name, surname, email address, telephone number, preferences for receiving marketing communications and details about how you engage with our marketing communications	No

3.4. Processing orders and delivering goods to you

When you purchase products on our Website, Isar Aerospace will process the Data necessary for order confirmation, invoicing and shipping. The Data processed allows us to efficiently manage transactions, provide timely updates on order status, and ensure that the goods are delivered to the correct address.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
Contract (Art. 6(1)(b) GDPR)	Name and surname, shipping and billing address, contact information (telephone number, email address), payment details, order details, and delivery preferences	Yes. It is a contractual requirement. If you do not provide this Data, Isar Aerospace will not be able to provide you with its products.

3.5. Customer support

To provide effective customer support, Isar Aerospace processes Data to address inquiries and resolve issues. This includes managing communication with customers and ensuring that customer needs are met promptly and efficiently.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
Consent (Art. 6(1)(a) GDPR)	Email address, subject of your inquiry, date of your inquiry, content of your inquiry, attachments to your inquiry, your name and (or) surname provided in your inquiry, reply to your inquiry, other information provided by you	No

3.6. Recruitment

When you apply for a position at Isar Aerospace, or when Isar Aerospace contacts you regarding a job opportunity, we process your Data as part of the recruitment process as described below. This process includes evaluating your qualifications, experience, and suitability for open positions within the Isar Aerospace organization. The Data enables us to communicate with you throughout the recruitment process, schedule interviews, assess your qualifications, and make informed hiring decisions.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
Consent (Art. 6(1)(a) GDPR)	Name and surname, contact information (telephone number, email address), CV/resume details, citizenship and country of birth, notice period, salary expectations, cover letter, educational background, employment history, references,	No

<p>Taking steps at the request of the data subject to enter into a contract (Art. 6(1)(b) GDPR)</p> <p>Legitimate interest in carrying out the selection of potential employees (Art. 6(1)(f) GDPR)</p>	<p>interview notes, interview transcripts, and other relevant information provided by the applicant</p>	
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3.7. Administration of Isar Aerospace's social media profiles

To manage Isar Aerospace's social media presence effectively, Isar Aerospace processes Data from individuals who interact with its social media profiles. This includes managing accounts on platforms such as Facebook, LinkedIn, Twitter, Instagram, and others.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
<ul style="list-style-type: none"> Consent (Art. 6(1)(a) of GDPR) Legitimate interest in administrating social media profiles (Art. 6(1)(f) of GDPR) 	<p>Name and surname provided in your social media profile, email address, messages, message information, attachments, comments, shares, reactions, other interactions and additional Data provided</p>	<p>No</p>

3.8. Compliance with legal requirements and defense of Isar Aerospace's legal interests

Isar Aerospace will retain the Data in accordance with statutory limitation periods to defend its rights and legal interests if necessary. Some Data must be retained to comply with legal requirements in accounting, archiving, and other areas. In rare cases, if you become involved in a legal process to which Isar Aerospace is a party, Isar Aerospace will use this Data for that legal process.

Legal basis for the processing	Categories of Data processed	Is the provision of Data a requirement?
<ul style="list-style-type: none"> Legal obligation (Article 6(1)(c) of GDPR) Legitimate interest in protecting our rights and legal interests (Article 6(1)(f) GDPR) 	<p>Name, surname, email address, contracts, legally binding documents and data, correspondence, legal documents, pleadings, annexes, court documents, investigative information, information about convictions and criminal offences, correspondence, possible breaches and incidents, and any other Data provided and collected</p>	<p>Yes, the provision of data is necessary if required by applicable laws. If you do not provide this data, Isar Aerospace will be unable to offer its services or products, or otherwise maintain a relationship with you</p>

4. Duration of Data retention

Isar Aerospace retains the Data in a form that allows your identity to be determined no longer than necessary for the purposes for which the Data is processed, and in accordance with legal requirements:

- Financial transactions Data is retained for 10 years from the date of the transaction, in compliance with applicable tax and accounting regulations.
- Data related to the conclusion and execution of agreements with business partners is retained for the duration of the agreement and for 10 years thereafter.
- Video recordings are retained for up to 4 weeks from the date of recording, except in cases where there is reason to believe that illegal actions have been recorded. In such cases, the recordings are retained until the relevant investigation and/or case is concluded.
- At the Launch Base facilities in Norway, launch vehicle related testing and launch operations recordings are retained for up to 4 weeks, and recordings made during launch operations are retained for 3 years from the date of recording.
- Data obtained through the recruitment process will be retained for up to 6 months after the recruitment process is concluded. If the statute of limitations is suspended or extended, or if legal proceedings are initiated, we will retain your data for the duration of that period or until the proceedings have been concluded.
- Isar Aerospace will retain any other data for up to 10 years.

5. Sources of Data collection

Isar Aerospace collects most of the Data from you. Where necessary for the purposes set out below, Isar Aerospace collects Data from other sources.

Source of origin of Data	Purpose of processing
Service provider, vendors, suppliers or other business partners (when you are a representative of such entities)	Concluding and executing agreements
Recruitment agencies, job search portals, professional social networks (e.g. LinkedIn)	Recruitment
Social media service providers	To administer our social media profiles

6. Data sharing and recipients

Where necessary for the above purposes and subject to applicable law, Isar Aerospace shares Data with the following recipients.

Recipients or categories of recipients	If the Data are to be transferred to a third country or an international organisation:	
	Third country outside the European Economic Area	Safeguard measure or exemption allowing the transfer
Companies of the Isar Aerospace Group		---
Accounting service providers: DocuWare GmbH; DATEV eG; XLedger AS; Demps & Partners PwC Norway, PartG; SAP- Lufthansa Industry Solutions AS GmbH		---
Norway: Norwegian Civil Aviation Authority; Andøya Spaceport AS (launch site operator)		---
Lawyers, notaries, bailiffs, data protection officers, auditors, consultants		---
Providers of IT tools and services, electronic communications service providers, travel agencies, insurance companies, accounting and other service providers, banks		---
State labour, social security, tax, supervisory authorities, police, prosecutors, courts, law enforcement and other state and local authorities		---
Greenhouse Software, Inc. (recruitment service provider)	UK	Adequacy decision
DocuSign, Inc. (electronic signatures management software provider)	EU / USA	EU Standard Contractual Clauses
Facebook (Meta) (social media service provider)	EU / USA	EU Standard Contractual Clauses
LinkedIn (social media service provider)	EU / USA	EU Standard Contractual Clauses
Microsoft Corporation (IT infrastructure and services provider)	EU / USA	EU Standard Contractual Clauses
Banks: Kreissparkasse München Straberg Ebersberg; Unicredit Bank AG; Nordea Bank Abp, Filial I Norge; Bank of America Merrill Lynch; Silicon Valley Bank; Pleo Technologies A/S	Various	EU Standard Contractual Clauses , performance of a contract (Art. 49(1)(b) of the GDPR)
Potential or actual purchasers of the business or part of it and their authorised advisers or representatives	Various	EU Standard Contractual Clauses

7. Your rights in relation to Data processing

My rights	Summary
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Right of access	The right to obtain confirmation from us as to whether Data relating to you is being processed and, if such Data is being processed, the right to have access to the Data and information about the processing.
Right to rectification	The right to require us to rectify inaccurate Data relating to you.
Right to erasure ('right to be forgotten')	<ul style="list-style-type: none"> - when Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; - when you withdraw consent on which the processing of Data is based and there is no other legal ground for the processing; - when you object to the processing of Data and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing purposes; <ul style="list-style-type: none"> - where the Data have been unlawfully processed; - where the Data have to be erased for compliance with a legal obligation;
Right to restriction of processing	<ul style="list-style-type: none"> - where the accuracy of the Data is contested by you; - where the processing of Data is unlawful and you oppose the erasure of the Data and request the restriction of their use instead; - where we no longer need the Data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; - where you have objected to the processing of the Data and until it has been verified whether our legitimate interests override yours.
Right to data portability	where you seek to receive the Data you have provided in a structured, commonly used and machine-readable form or to transmit those Data to another controller, the processing is based on consent or on a contract and is carried out by automated means.
Right to object	where the collection and use of the Data is based on a task carried out in the public interest or in the exercise of official authority vested or legitimate interest, including profiling, or where you object to the collection of your Data for direct marketing purposes.
Right to withdraw consent	where the processing of Data is based on consent and you seek to withdraw it at any time.
Right to lodge a complaint	Right to lodge a complaint with a supervisory authority

8. Automated decision-making, including profiling

Isar Aerospace does not make decisions based solely on automated processing of Data, including profiling, which would produce legal effects concerning you or similarly significantly affect you.

9. Cookies and similar technologies

The cookies and similar technologies listed below are used to save information or to access information that is already stored on your devices. A cookie is a small piece of data saved by the Website on your computer or mobile device. Cookies facilitate the Website's ability to remember details about your visit, thereby

simplifying future visits and enhancing the site's utility for you. Additionally, other technologies, such as unique identifiers for identifying your browser, app, or device, pixels, and local storage, may be employed for similar purposes.

www.isaraerospace.com

Purpose of processing	Cookie	Category	Whether third parties will have access to the information	Duration of operation
A security cookie that helps protect against Cross-Site Request Forgery (CSRF) attacks. This is essential for maintaining the security of our website and user data.	CRAFT_CSRF_TOKEN	Necessary	No	Session
Maintains your session information while browsing the website, allowing you to stay logged in and navigate between pages securely.	CraftSessionId	Necessary	Yes	Session
These cookies remember your cookie preferences and consent choices, ensuring we respect your privacy settings on future visits.	cookie_consent_level and cookie_consent_user_accepted	Necessary	No	2 months 1 day
<ul style="list-style-type: none"> • These are Google Analytics cookies that help us understand how visitors use our website. They collect information such as: How long you spend on the website • Which pages you visit • How you arrived at the site • Basic anonymous visitor statistics 	_ga and related cookies (_ga_[XYZ]; _ga_gtag_UA_[XYZ])	Tracking	Yes	2 years
Another Google Analytics cookie that assigns a unique ID to track user behavior on the website	_gid	Tracking	Yes	24 hours

10. How can I manage cookies?

Most browsers give you the ability to manage cookie settings, including the use of cookies, and to delete cookies and browsing history. This applies to browsers such as [Chrome](#), [Safari](#), [Firefox](#), [Internet Explorer](#), and [Opera](#).

11. Data Protection Officer's contact details

You can contact our Data Protection Officer at dataprotection@isaraerospace.com.

12. Can this Policy be amended?

Isar Aerospace may update this Policy from time to time. The latest version of this Policy can be found at www.isaraerospace.com.

Last updated: March 2026

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