

# Empyrean View Privacy Policy

## I. DEFINITIONS:

- a. sUAS: small Unmanned Aerial System. A drone. Empyrean View utilizes only drones classified by the FAA as small unmanned aerial systems. All of our drones are less than 5 pounds, all are registered with the FAA, and they will never be operated commercially by anyone other than an FAA 107 certified Remote Pilot.
- b. Consent: The term “consent” means words or conduct indicating permission. Consent must be informed and conduct indicating permission may be express or implied, depending on the context.
- c. Covered data: Covered data means information collected by a UAS that identifies a particular person. If the data collected by UAS will not be linked to an individual’s name or other personally identifiable information, or if the data is altered so that a specific person is not recognizable, it is not covered data.
- d. Data subjects: The term “data subjects” refers to the individuals about whom covered data is collected.

## II. OUR PRACTICES

- a. Our purpose in the use of drones:
  - i. Empyrean View uses drones only in the capacity of capturing digital images and video for the purposes of:
    1. Commercial or residential real estate marketing
    2. Inspection of buildings, utilities, or infrastructure.
    3. 2D or 3D orthomosaic mapping
    4. Event photography and videography
    5. Creating photographic artwork or cinematography
- b. We will not collect, retain or divulge covered data unnecessarily.
  - i. Unless required within the scope of contract, personally identifiable information will not be recorded, or will be obfuscated in our work product.
  - ii. Covered data will be retained only as long as required under the contract by which it was gathered.
  - iii. Where it will not impede the purpose for which the UAS is used or conflict with FAA guidelines, we will make a reasonable effort to minimize UAS operations over private property without consent of the property owner or without appropriate legal authority.
- c. We will inform you of the use of our sUAS.
  - i. Where practicable, we will make a reasonable effort to provide prior notice to individuals of the general timeframe and area that they may anticipate our UAS intentionally collecting covered data. This notice will include a reference to this privacy policy, which will be posted on our website.
- d. Type of data collected:
  - i. Except when used in indoor venues specifically required by contract, our drones will only collect photographs and video of the outside of properties and will never be used in a way that attempts to collect information about the interior of properties through windows or open doors.
  - ii. Unintentionally collected personally identifiable information will be digitally removed or obfuscated to de-identify.
- e. Data security: We will make a reasonable effort to secure and regularly monitor our systems for breach and data security risks.

## III. LEGAL REVIEW AND COMPLIANCE: Empyrean View will monitor and comply with evolving federal, state and local UAS law, as well as comply with law enforcement requests for data, as practicable.