# **AIRBUS**

#### PRIVACY INFORMATION NOTICE

## **Marketing Communications & Publications**

#### Introduction

Airbus S.A.S (also known as, "Airbus", or "we" or "us") appreciate your interest in our products, services and business lines and your use of our communities.

Your privacy is important to us and we want you to feel comfortable when you use our communication services.

Airbus is committed to protecting the rights of individuals in line with the **General Data Protection Regulation** (reference EU2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (hereinafter referred as: "GDPR") as well as each applicable national Personal Data protection laws and regulations (collectively referred as "Data Protection Laws and Regulations"). The protection of your privacy and Personal Data is an important concern to which we pay special attention throughout our processes.

Our web-communications may sometimes include links to other websites or applications which are not necessarily covered by this Privacy Notice. In this event, we encourage you to carefully read the privacy policies of such websites.

This Privacy Notice will inform you of the Personal Data we process when we are sending marketing communication; how we use and disclose your Personal Data; how you can control the use and disclosure of your Personal Data; and how we protect your Personal Data.

#### Which sources and what Personal Data do we use?

Personal Data is information that can be used to identify a person either directly or indirectly (hereinafter referred as "Personal Data"). This definition covers a wide range of data enabling the identification of an individual.

The Personal Data we process under this Privacy Notice are as follows:

- Identification data such as first name, last name
- Email address, phone number, occupation, company
- IT data /Digital activity data: history of websites records you have accessed
- Account information: settings and preferences, login

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We may collect this Personal Data cumulatively:

- **Directly** from you for the information you put in your profile.
- Indirectly for those Personal Data that we may collect in the course of our business.

### What are the purposes of the processing of your Personal Data?

During the course of its business, Airbus will collect and process your Personal Data in accordance with this Notice. Your Personal Data may be used for the following purposes (hereinafter referred as: the 'Purposes'):

1. Marketing and lead generation.

To the extent permitted by law, we may use your Personal Data for marketing and promotional purposes, including communications through email or equivalent electronic means. For example, we use your Personal Data, such as your email address, to send news and newsletters, special offers, promotions and competitions, or to otherwise contact you about services or information we think will interest you.

#### 2. Communication.

We use your Personal Data to communicate with you, including responding to requests for assistance. We can communicate with you in a variety of ways, including email and via your social media accounts if you have agreed, and/or text message.

#### 3. Website Browsers / Administration.

We use your Personal Data for administrative purposes, including to help us better understand how our customers access and use our websites and applications; to provide reports to prospective partners, service providers, regulators, and others; to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect our customers, partners and us; and to enforce our policies, directives and processes.

#### 4. To protect us and others.

Where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of policies, terms, and other policies.

We will use your personal information for the above Purposes only, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose (for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation for example). If we need to use your Personal Data for an unrelated purpose, we will notify you prior to this further Personal Data processing and provide you the relevant privacy information notice.

### What is the legal basis for processing your Personal Data?

As a responsible company, we need a lawful basis for collecting and/or processing your Personal Data in accordance with the provisions set out in the GDPR and the relevant applicable Data Protection Laws and Regulations. The legal basis for processing your Personal Data under this Privacy Notice is **within the scope of a legitimate interest** 

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On occasion taking into account the minimum privacy impact for you, the processing of your personal data might be necessary for the following legitimate interest:

- When you or your legal entity is engaged into a commercial relationship with Airbus, we may have a legitimate interest to process your Personal Data to ensure fluid execution of our respective contractual obligations
- For fraud detection and prevention and investigation of criminal acts.
- For Information, system, network and cyber security within Airbus
- For General Corporate Operations and Due Diligence
- For providing you an access to the Website and/or service(s) that have been purchased by your company, when you have been designated as a Website user by your company

#### Who will receive your Personal Data?

We may disclose your Personal Data to the following recipient(s) on a strict need to know basis and for the purposes as outlined in this Privacy Notice:

- Airbus SAS and its affiliates, on a need-to-know basis for the purposes as outlined in this Privacy Notice:
- Authorised persons working for or on behalf of Airbus, including our agents, service providers and advisers providing the variety of products and services we need such as our subcontractors engaged into helping us to provide Website technical support
- Other authorised third parties in connection with any merger, reorganization, a sale of some or all Airbus assets, or a financing or acquisition of all or a portion of our business by another company.
- Law enforcement or government authorities or other legal processes to comply with applicable law, or in response to any subpoenas, court orders, or to establish or exercise our legal rights or to defend against legal claims.

## Which countries and/or regions will Airbus transfer your Personal Data to?

Airbus processes your Personal Data mostly in the EEA and UK. On occasion Personal Data is transferred to the relevant recipients as described in Section "Who will receive your Personal Data?", on a need-to-know basis, including entities outside the EEA in France / USA / China / UAE / Russia / Japan / Germany.

This transfer is subject to appropriate safeguards, within Airbus through the legal framework of our Binding Corporate Rules, that can be found on our website <a href="https://www.airbus.com">www.airbus.com</a> or viewed here <a href="https://www.airbus.com">Airbus BCR's</a> or through alternative contractual frameworks (so called Standard Contractual Clauses) or relevant adequacy decision where the relevant data recipients as defined in Section "Who will receive your Personal Data?" is engaged to help us providing the community to you.

Our Binding Corporate Rules allow us to transfer Personal Data within our international organisation for Airbus daily business activity and internal organisation, and they include a list of countries where Airbus Affiliates having signed the BCR and which might have access to your Personal Data if relevant.

Australia, Belgium, Brazil, Canada, Chile, China, Colombia, , Denmark, , Finland, France, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Italy, Japan, Kazakhstan, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Nigeria, Norway, Oman, Philippines, Poland, Qatar, Romania, Russia, Saudi Arabia, Singapore, Slovakia, South Africa, South Korea, Spain, Switzerland, Taïwan, Thailand, Tunisia, Turkey, United Kingdom, United Arab Emirates, Uruguay, United States of America.

## How long will your Personal Data be stored?

We process and store your Personal Data up to three (3) years after your last interaction with the Website, in accordance with the GDPR or any local data protection laws requirements.

#### What about the security of your Personal Data?

We use technical and organizational security measures in order to protect the Personal Data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorised persons. Our security procedures are continually enhanced as new technology becomes available.

### What are your rights?

Under some circumstances provided by law, you may at any time exercise your data protection rights as listed below:

- Right to access/obtain a report detailing the information held about you: You have the right to obtain confirmation as to whether or not your Personal Data is being processed by Airbus and if so, what specific personal data is being processed.
- **Right to correct Personal Data:** You have the right to rectify or request to have rectified any inaccurate Personal Data concerning you.
- Right to be forgotten: In some cases, for instance, when the Personal Data is no longer necessary in relation to the Purposes for which they were collected, you have the right for your Personal Data to be erased.
- Right to restrict the processing of your Personal Data: You have the right to restrict the processing of your Personal Data, for instance when the processing is unlawful and you oppose the erasure of your Personal Data. In such cases, your Personal Data will only be processed with your consent or for the exercise or defense of legal claims.
- Right to data portability: You have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit those Personal Data to another data controller.
- Right to object: In some cases required by law, you may ask us to stop processing your Personal Data.

## How to exercise your rights and/or contact Airbus in respect of your Personal Data?

If you want to exercise your rights or you are unhappy with the way in which your Personal Data has been processed or should you have any questions regarding the processing of your Personal Data, you may refer in the first instance to the Airbus Data Protection Officer, who is available, at the following email address: <a href="mailto:dataprotection@airbus.com">dataprotection@airbus.com</a> or you can write to the address below:

Airbus SAS, Head of Data Protection, 2 rond-point Emile Dewoitine 31700 Blagnac cedex. France

In case of doubt of your identity, we may ask you to justify it by enclosing a copy of any identity document.

## Are you obliged to provide your Personal Data?

Personal data may be necessary to ensure your identification in certain communities and services.

Under certain circumstances, when some Personal Data are necessary to enter into a contract or to comply with legal obligation, any failure to provide the requested Personal Data may conduct us not being able to fulfil our contractual/legal obligations or to achieve the expected results.

## Are your Personal Data the basis for automated decision-making, including profiling?

As a matter of principle, we do not use fully automated decision-making processes. In the event that we should use such processes, we will advise you in advance.

## How to ask for assistance from the competent authorities?

If you remain unsatisfied, then you have the right to apply directly to a Data Protection Supervisory Authority. Listed below are the four main European countries where Airbus operates and the relevant Supervisory Authority

FRANCE: CNIL: Supervisory Authority France

#### **GERMANY:**

Datenschutz-hamburg: Supervisory Authority for Airbus Operations GmbH

or

Ida Bayern: Supervisoy Authority for Airbus Companies in Bavaria, Germany or any other competent regional German authority as the case may be

**SPAIN**: AGPD.Supervisory Authority Spain

**UK**: ICO: Supervisory Authority UK

## Modification of the Privacy Notice

Airbus will update this Privacy Notice from time to time in order to reflect the changes in our practices and services and also to remain compliant to Data Protection Laws and Regulations. We will inform you of any substantial modification in how we process your Personal Data.