

Data Privacy & Protection

Introduction

Stelia Aerospace North America Inc, an affiliate of Airbus Atlantic, (herein referred to as "Stelia", "we" or "us") is committed to protecting the privacy of individuals and to complying with applicable personal data protection laws and regulations. We want you to feel comfortable about how we collect, process, secure and share your personal data. This Privacy Notice details the types of personal data we collect, how we use your personal data, who we share it with and how you can control its use.

This Privacy Notice applies to the main personal data processing Stelia performs. Information relating to specific processing or tools may be detailed in a dedicated privacy notice. Also, please note that our Careers page and other pages 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 these linked websites.

What is personal data?

Personal data is information that can be used to identify a person either directly or indirectly. It includes information such as name, contact details, identification numbers, financial data, location data or online identifiers.

What personal data do we use?

Depending on the nature of your relationship with Stelia, we collect, use and process the following categories of personal data:

- **Identification data** such as name(s), family name(s), contact details (postal address, email, telephone number(s)), signature, citizenship/nationality, age, gender, date of birth, place of birth, ID number, passport number, work authorization details, social insurance number, export control status, picture/image, voice, videos, CCTV images, and audio recordings
- **Professional data** such as CV, whether you are an employee of Stelia or Airbus or one of its subsidiaries or a shareholder
- **Economic and financial data** such as bank details and credit card details.
- **IT data** such as IP address, user account, company personal identifier(s)/corporate IDs, security pass number, smartcards, Cookie identifiers and other tracking technologies, radio frequency identification tags, activity logs (from tools and

protocols, apps, security building access control, etc.), passwords for access to IT systems and/or websites.

We may collect this personal data:

- **directly** from you when you complete a form and you provide us such information, and/or
- **indirectly** through the organisation you are working for if needed for a purpose listed below or information made publicly available.

What are the purposes of the processing of your personal data?

Stelia may process your personal data for the following purposes:

1. **Website Browsers / Administration**

- We may use your personal data for administrative purposes, including to help us better understand how our customers, suppliers, third party access and use our websites; 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.

2. **Marketing**

- Under the conditions permitted by law and when relevant, we may use your personal data for prospecting and marketing purposes, including communications through email or equivalent electronic means. For example, we may use your personal data, such as your email address, to send news and newsletters or to otherwise contact you about services or information on Airbus products we think will interest you.

3. **Communication**

- We may 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.
- We may use your personal data for our internal and external communication media, our internal social network (HUB) or public social media but also for event management (conferences, fairs, seminars and airshows)

- We may collect your personal information in order to inform Stelia or Airbus, its financial results, its products and other interested company related matters. Information includes regular updates on major events like publication of financial results, our newsletter to shareholders, investors and financial markets, invitations for events, surveys, dedicated campaigns and other elements related to Airbus business, securities and performance only where applicable
- 4. Recruitment**
- We may use your personal data to ensure that we recruit and select appropriate individuals to work at Stelia.
- 5. Performance of Stelia business activities and Customer services**
- We may use your personal data for Stelia sales and customer services activities, including customer relationship management, for technical support or other similar purposes and to establish and maintain customer accounts.
 - We may process your personal data in the course of Stelia procurement activities such as new products or services contracts and supplier management.
 - We may process your personal data in the course of Stelia public affairs management and/or Intellectual Property rights management, guest travel management.
- 6. Research and development**
- We may use your personal data for research and development purposes, including public funding submission requests, improving our websites, applications, services, and customer experience and for other research and analytical purposes dedicated to improving our products, services, businesses, operations and processes.
- 7. Security and Health & Safety**
- We may use your personal data for user access right management and monitoring in our website(s), IT security management, access badge management, site admission, visitor booking security video surveillance (CCTV), first response units, security clearance and/or health & safety procedures.
- 8. To comply with legal obligations**
- We may use your personal data to comply with applicable legal obligations, including responding to an authority or court order or discovery requests, and to comply with export control and sanctions requirements.

9. 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 data 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 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 with the relevant privacy information notice.

What is the legal basis for the processing of 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 relevant applicable Data Protection Laws and Regulations. Subject to the applicable law(s), we process your personal data under the following legal basis:

1. **To comply with contractual obligations.** For Stelia employee(s), we process your Personal Data as part of the performance of employment contract to which you are party in order to complete our respective contractual obligations. When you subscribe to a particular service through a website, the purposes of processing your personal data are primarily determined by that service and we will process your information so that we can provide that service to you.
2. **As a result of your consent.** When you have consented to the processing of your personal data by us for certain services, you can withdraw consent at any time by following the instructions provided in the application process or by contacting us at dataprotection@airbus.com. For further information on the right of withdrawal, please see below Section "*How to exercise your rights and/or contact Airbus in respect of your personal data?*"
3. **Within the scope of a legitimate interest.** On occasion, taking into account the minimum privacy impact for you, the processing of your personal data might be necessary:
 - For the administration and management and performance of our business relationship including accounting, auditing, performance of the contract.

- For the analysis and optimisation of our websites.
 - For ensuring IT security (to detect security threats, frauds or other malicious or criminal activities) and the IT operation of Airbus. For ensuring security of Airbus facilities and individuals.
 - For prevention and investigation of criminal acts.
 - For communication purposes to keep you up-to-date on the latest information about our services, solution and/or business activities, events, marketing campaigns, market analysis or other promotional activities and for analysis and improving the quality of our services and communication with you.
 - For monitoring the compliance with our policies and standards.
4. **On the basis of Stelia's legal obligations or in the public interest.** Stelia, as any other company, is subject to legal obligations and regulations. In some cases, the processing of your personal data will be necessary for us in order to fulfil these legal obligations.

Who will receive your personal data?

Subject to the applicable law, we may disclose your personal data to the following recipient(s) on a need to know basis:

- Airbus and its Affiliates;
- Authorised persons working for or on behalf of Stelia, including our agents, service providers and advisers providing the variety of products and services we need (including IT, procurement, communication, compliance, benefits & pension administration, insurance, security and training services);
- Stelia business partners in connection with Stelia activities (including educational institutions for recruitment, law firms, auditors, consultants, insurance company, flight schools);
- Stelia customers;
- Other authorised third parties in connection with any merger, reorganisation, sale of Stelia's assets, or a financing or acquisition of our business by another company;
- Law enforcement or authorities where necessary to comply with applicable law.

Is any of your personal data transferred overseas?

We may share your personal data within Airbus. Any transfers within Airbus for Airbus daily business activity and internal organisation are covered by an intra-group agreement (see [Binding Corporate Rules](#)). The Binding Corporate Rules includes contractual protections to ensure that your personal data receives an adequate level of protection wherever it is transferred to within Airbus, including overseas and within the European Economic Area and the UK.

In addition, we may share some personal data to third parties located outside the European Economic Area and the UK. We always take steps to ensure that any transfer of information is carefully managed to protect your privacy rights:

- We will only transfer personal data to countries which are recognised as providing an adequate level of legal protection or where we are satisfied that arrangements are in place to protect your privacy rights,
- transfers to service providers and other third parties will be protected by contractual commitments (such as the European Commission-approved Standard Contractual Clauses) or other legally acceptable mechanisms that ensure an adequate level of protection, and
- any requests for personal data information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed.

We may also collect and process personal data in third countries; in line with local personal data protection laws and regulations and detailed in a dedicated privacy notice. If you have any questions regarding transfers, please contact us (dataprotection@airbus.com) for further details.

How long will your personal data be retained?

We retain your personal data as long as is reasonably necessary for the purposes for which it was collected. In some circumstances we may retain your personal information for longer periods of time than is needed for those purposes, such as where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

What about the security of your personal data?

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

What are your rights?

At any time, you may exercise your personal data protection rights as listed below by contacting us at dataprotection@airbus.com:

- **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 Stelia and if so, what specific personal data is being processed.
- **Right to correct personal data:** You have the right to change 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 by Stelia, 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 defence of legal claims.
- **Right to data portability:** Under some circumstances provided by law, 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 defined in law, you may ask us to stop processing your personal data.
- **Right to withdraw consent:** Where your consent is required, you may at any time withdraw such consent. However, please note that if you withdraw your consent, you may not be able to access and use certain information, features or services.

How do you exercise your rights?

If you want to exercise your rights, if you are unhappy with the way in which your personal data has been processed, or you have questions regarding the processing of your

personal data, please contact the Airbus personal data Protection Officer at the following email address: dataprotection@airbus.com.

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

For the newsletters included in the Preference Centre, you may update your personal data at any time directly on it.

Do we use automated decision-making?

As a matter of principle, we do not use fully automated decision-making processes such as profiling. If this were to change, you would be informed.

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 main countries where Airbus operates and the relevant Supervisory Authority.

FRANCE: [CNIL: Supervisory Authority France](#)

CANADA : https://www.priv.gc.ca/index_f.asp

Cookies and similar technologies

Stelia does not use Cookies and other trackers on its websites.

Modification of the Privacy Notice

Stelia will regularly update this Privacy Notice to reflect any changes in our practices and services. We will inform you of any substantial modification in how we process your personal data.