



# SITA THIRD PARTY DATA PRIVACY POLICY

## **Policy description**

This Policy outlines the standards by which SITA will collect and use Personal Information relating to its Customers, Vendors and Third Parties

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## 1. INTRODUCTION

SITA collects uses and discloses Personal Information in accordance with applicable data privacy laws and as stipulated in this Data Privacy Policy ("Policy"), which outlines the standards by which SITA will collect and use Third Party Personal Information.

## 2. DEFINITIONS

**"Third Party"** means an actual or prospective customer, distributor, reseller, vendor, supplier, consultant, professional adviser, business partner or any other third party that does or may do business with SITA.

**"Personal Information"** means data relating to any Third Party, which allow the identification of an individual person directly or indirectly from that data (such as information relating to an employee or a representative of a Third Party, or any information about a Third Party's own consumers, customers or suppliers). Examples may include name, address, email, telephone number, customer ID, or tax ID.

## 3. DATA PRIVACY PRINCIPLES

The core data privacy principles below are the foundation of this Policy.

### 3.1 Lawfulness, fairness and transparency

SITA shall process Personal Information fairly, and in accordance with this Policy and applicable laws.

### 3.2 Data Accuracy

SITA will take all reasonable steps to ensure that Personal Information is accurate and complete and will rectify or erase any incorrect Personal Information without delay.

### 3.3 Purpose Limitation

SITA will ensure that Personal Information collected is for specified, explicit and legitimate purposes and only to the extent necessary to fulfil those purposes.

### 3.4 Data Retention

SITA will only keep Personal Information for as long is necessary to fulfil the purpose(s) for which it was collected or to comply with local law.

### 3.5 Data Security

All Personal Information collected will be processed in a secure manner.



## 4. PURPOSES OF THE PROCESSING

SITA collects Personal Information in order to perform its business functions and to provide and/or to source services to and/or from Third Parties.

The standard purposes for which SITA collects and processes Personal Information include:

- the administration of orders and accounts;
- the provision of products and services;
- business development;
- marketing, advertising and public relations in connection with SITA's business activities, goods or services;
- customer relationship management including satisfaction surveys, customer claims and after sales service;
- the conduct of SITA's business activities;
- compliance with applicable law or regulation;
- any other purpose which the data subject is informed of from time to time when conducting business with SITA.

## 5. TYPES OF DATA COLLECTED

The types of Personal Information SITA collects and processes include:

- identification data, such as first and last name, date and place of birth, nationality, client ID;
- contact details, such as address, telephone number and email address;
- professional details, such as job title, affiliated organization, data related to transactions involving goods and services, data relating to business projects;
- when permitted by law, national identifiers, such as tax ID, government identification number;
- financial data, such as bank account number, bank details.

SITA may also collect Personal Information, directly and by automated means, whenever a Third Party accesses SITA's websites. For more information on how SITA collects Personal Information on its websites, please refer to SITA's Web Privacy Statement on the [www.sita.aero](http://www.sita.aero) website

## 6. SHARING AND DISCLOSURE OF DATA

SITA only allows access to Personal Information by those who require access to perform their job duties and to third parties who have a legitimate purpose for access to that information.

### 6.1 Group entities

Personal Information may be shared with SITA's group entities, in compliance with applicable law, for purposes consistent with this Policy.



## 6.2 Vendors and suppliers

SITA may share or disclose Personal Information to vendors and suppliers who perform specific activities on behalf of SITA.

## 6.3 Law enforcement purposes

If requested or required by government authorities, such as law enforcement authorities, courts, or regulators, or otherwise to comply with the law, SITA may disclose any information about Third Parties. SITA also may disclose information collected about Third Parties in order to exercise or protect legal rights or defend against legal claims.

## 6.4 Sale or merger of business

SITA may transfer Personal Information to a Third Party if it or any of its affiliates is involved in a corporate restructuring (e.g., a sale, merger, or other transfer of assets).

# 7. SECURITY AND INTEGRITY OF DATA

SITA maintains appropriate administrative, technical and physical safeguards designed to help maintain the security, confidentiality and integrity of Personal Information and to protect it against accidental or unlawful destruction, accidental loss, unauthorised alteration, disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in its possession.

# 8. DATA TRANSFERS

SITA may transfer Personal Information to countries outside the European Economic Area (EEA) and, when it does, it will ensure that either the European Commission has issued a decision recognising the adequate level of protection of Personal Information in the country receiving the data, or in the absence of such decision, SITA will implement appropriate safeguards to protect the Personal Information that is being transferred.

# 9. DATA PRIVACY RIGHTS

Data subjects have a right to access and to obtain a copy of their Personal Information, and to request that it is updated or rectified where it is outdated or inaccurate.

Data subjects may further request that their Personal Information be erased or restricted where it is no longer necessary in relation to the purposes for which it was collected or otherwise processed.

To obtain a copy of, or update Personal Information, please send an email at: [privacy@sita.aero](mailto:privacy@sita.aero).



## 10. DIRECT MARKETING

SITA may use some of the Personal Information it collects from Third Parties for marketing purposes. If data subjects no longer wish to receive marketing messages from SITA or its partners, they may exercise their right to opt-out from receiving such messages by following the instructions included in the message they receive from SITA or by emailing SITA at [info@sita.aero](mailto:info@sita.aero).

## 11. WHO TO CONTACT

For any questions or comments in relation to this Policy, or SITA's privacy practices, please contact: [privacy@sita.aero](mailto:privacy@sita.aero).