

DATA PRIVACY NOTICE

Date: 14 April 2020

Scope: Shareholder Relations – On-boarding, due diligence, and other administrative tasks relating to the Directors of the SITA Board and the Representatives of the SITA Council.

Introduction

1. SITA SC (“SITA”) is committed to maintaining your trust by ensuring that your privacy is protected. This Privacy Statement explains how we collect, use, share and protect personal data.
2. SITA processes your personal data in a transparent and lawful way. Any personal data you provide will only be used in accordance with this privacy statement.
3. In addition to the specific processing information in this Data Privacy Notice, SITA processes personal data in accordance with its SITA Services and Web Privacy Statement located at <https://www.sita.aero/copyright-menu/privacy-statement>.

What is personal data?

4. Personal data is any information relating to an identified or identifiable person. Name, address, phone number, date of birth, email address, marital status, and employment details, are all examples of personal data.

Which personal data do we process for which purposes?

5. SITA processes the following personal data elements (amongst others) for the purposes of on-boarding, due diligence, and dealing with administrative tasks, relating to the Directors of the SITA Board and the Representatives of the SITA Council:

Board Directors	Council Representatives
Date of Birth	Date of Birth
Full Name	Full Name
Gender – this is not required specifically but is known via passport data and from data gathered for registration purposes for hotels	Gender – this is not required specifically but is known via passport data and from data gathered for registration purposes for hotels
Marital status (for social security purposes)	
Nationality and any second nationality	Nationality and any second nationality
Photograph	Photograph
Signature (for some Directors only)	Signature (for some Representatives only)
Business name & address including country	Business name & address including country
Business telephone numbers	Business telephone numbers
Emergency contact details required when at meetings	Emergency contact details required when at meetings
Home address	
Personal and/or professional email (their choice to provide)	Personal and/or professional email (their choice to provide)
Bank account information	Bank account information
Passport number, including copy of passport	Passport number, including copy of passport
Job title and description of role (professional biography details including curriculum vitae)	Job title and description of role (professional biography details including curriculum vitae)
Expense details including travel booking information and other proof for expense claims	Expense details including travel booking information and other proof for expense claims
Portal access – password provided which Director is asked to change	Portal access – password provided which Representative is asked to change
Copies of utility bills	
Date of appointment	Date of appointment
Date of resignation	Date of resignation
Contact details of personal assistants	Contact details of personal assistants
Travel details	Travel details

6. Other than dietary requirements, we do not collect personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sexual orientation, biometric or health data.

Lawfulness of processing

7. Processing will always be based on lawful grounds:

- a. Performance of a contract

We collect and process the above personal data as it is necessary for the performance of your obligations to SITA as a Board Director or Counsel representatives, and SITA's obligations to you under SITA's Articles of Association.

b. Legitimate interest

We collect and process the above personal data as it is necessary for the purposes of the legitimate interests of SITA in relation to the corporate governance, due diligence, and proper management of SITA's global operations, and to ensure SITA's compliance with applicable laws/regulations in non-EU countries, including in the areas of finance, tax, banking and company law, anti-bribery and anti-corruption law, fraud and money laundering law (including "know your customer" law).

c. Legal obligation

We collect and process the above personal data in order for SITA to comply with:

- (1) Belgian law (SITA SCRL being a Belgian company) in the (non-exclusive) areas of commercial, corporate, employment and social security laws applicable to our Board of Directors; and
- (2) applicable legal and regulatory obligations in any EU country where SITA has obligations to register its Board of Directors and in the areas of finance, tax, banking and company law, anti-bribery and anti-corruption, fraud and money laundering law (including "know your customer" law).

Profiling

8. We will not use your personal data for decisions based solely on automated processing if the decision produces legal effects concerning you or significantly affects you, unless you gave your explicit consent for this processing.

Do we share your personal data with third parties?

9. We may disclose your personal data to our agents or sub-contractors for the purposes identified above. In such cases, we have taken appropriate safeguards to require that the personal data we process will remain protected in accordance with this privacy statement. Where that agent or sub-contractor is located outside of the EU or outside an approved non-EU country (approved by way of a data privacy "adequacy decision"), we will ensure that appropriate safeguards are in place in relation to the data transfer to those parties, such as EU Model Clauses or Binding Corporate Rules.
10. We will not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.
11. We may disclose your personal data without your permission to the extent that it is required to do so by European Union or National law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

Security

12. We are committed to ensuring that your personal data is secure. In order to prevent unauthorized access or disclosure, we have put in place appropriate technical and organisational measures to safeguard and secure the personal data we process.

Data retention

13. We will store your personal data only for as long as necessary for the purposes for which your personal data is processed.

Data subject rights

14. You may request details of personal data which we hold about you. Please write to SITA at the following link <https://www.sita.aero/copyright-menu/data-subject-rights> in relation to any such request.
15. If you believe that any personal data we are holding on you is incorrect or incomplete, please contact us as soon as possible, at the link above. We will correct any personal data found to be incorrect.
16. You may always choose to object to the collection or use of your personal data whenever data is processed for the legitimate interest of SITA, however SITA may continue to collect or use such data where SITA can demonstrate compelling overriding legitimate grounds for the processing, or for the establishment, exercise, or defence of legal claims.

Further information

17. If you have any questions about this privacy statement or questions or complaints about the processing of your personal data by SITA, or to contact SITA (as the Controller of the processing of your personal) or the SITA DPO's office, contact privacy@sitaaero.com.
18. If you are dissatisfied with SITA's handling of any privacy complaints, you have the right to lodge a complaint with your relevant data privacy supervisory authority.