

# DATA PRIVACY NOTICE

**Date:** 18 September 2020

**Scope:** Training & Education (for Legal Compliance) – Notice to SITA Employees/Contractors and Customer Staff

## Introduction

1. Société Internationale de Télécommunications Aéronautiques S.C.R.L., SITA N.V., and their affiliates (“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 transparently and lawfully. 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 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) to carry out and monitor Legal Compliance training and education of SITA employees and applicable contractors, as well as participating customer staff:
  - a. Your compliance courses (completed/not completed), training tracking information, company/entity, job title/role, employee number, division/unit, user ID, office location, country, reporting manager, name, professional email.
6. 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 (SITA employees and contractors only)**

We collect and process the above personal data as it is necessary for the performance of the employment contract between you and SITA.

- b. **Legitimate interest**

We collect and process the above personal data as it is necessary for the legitimate interests of SITA in relation to the prevention of fraud and other unlawful behaviour, and SITA’s ongoing compliance with but not limited to, applicable non-EU anti-bribery and anti-corruption laws, fraud law, anti-money laundering, and company law.

- c. **Legal obligation**

We collect and process the above personal data for SITA to comply with, but not limited to, applicable EU anti-bribery and anti-corruption laws, fraud law, anti-money laundering, and company 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 click the following link <https://www.sita.aero/copyright-menu/data-subject-rights> and follow the instructions provided, 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](mailto: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.