

AIRBUS

PRIVACY

INFORMATION NOTICE

related to Airbus Digital Trust Solutions (ADTS)

Introduction

Airbus SAS and its Affiliates (also known as, “Airbus”, or “we” or “us”) provide to its employees digital trust solutions, to deliver them digital certificates that can be used for electronic signature or authentication. To this extent, we use dedicated tools and software to generate, deliver, monitor, renew and revoke various kind of digital certificates (hereinafter referred as “ADTS”). When certificates are delivered to you through ADTS, we process your personal data in order to deliver you the related services. For instance, when you request certificates from Airbus, we process your personal data in order to be generate and deliver to you those certificates.

Your privacy is important to us and we want you to feel comfortable using ADTS.

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 business processes.

However, ADTS tools may 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 collect when using ADTS; 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 : first name, last name, birthdate, birth location, gender, nationality, professional email address, professional phone number, ID document
- Professional data : Company and address Company, Legal entity under which they are under contract with Airbus, Badge number, Group matricule
- IT data /Digital activity data: device serial number (mobile phone), login, unique ID, devices, private encryption keys, public encryption keys
- Account information: system rights and permissions

We may collect this Personal Data:

- **directly** from you by entering your contact details when you request your certificates;

- **indirectly** for those Personal Data that are available on the Airbus employees directories and databases.

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

By using ADTS, Airbus will collect and process your Personal Data for the following purposes (hereinafter referred as: the 'Purposes'):

- *Digital certificate issuance, management and revocation*
 - We use your Personal Data to issue personal and nominatives digital certificates. As some of those certificates may be used to sign documents or authenticate users, we need your Personal Data to be able to legally demonstrate who is behind a specific digital signature.
- *Legal compliance*
 - We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.
- *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 this further Personal Data processing and provide you the relevant privacy information notice.

What is the legal basis for 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 GDPR and the relevant applicable Data Protection Laws and Regulations. The legal basis for processing your Personal Data under this Privacy Notice are:

To comply with contractual obligations

If you are an Airbus employee, 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.

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 following legitimate interest:

- For compliance with all the local and foreign laws relating to digital signature, especially when processing of personal data is necessary to be able to authenticate a signed document or a specific signature,
- For fraud detection and prevention and investigation of criminal acts,
- For Compliance with foreign law, law enforcement, court and regulatory bodies' requirements
- For Information, system, network and cyber security within Airbus,
- For General Corporate Operations and Due Diligence,
- For Product development and enhancement (incl. the analysis and optimization of the ADTS tools).

On the basis of Airbus' legal obligations

Airbus, as any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for Airbus in order to fulfil these obligations. For instance, when we deliver certificates dedicated to electronic signature, we may keep your data for legal reasons, especially to be able to audit and prove which identity was linked to a specific issued certificate in order to authenticate a signature.

Who will receive your Personal Data?

We may disclose your Personal Data to:

- Airbus 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 IT maintenance and 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 process 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. 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.

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 www.airbus.com or viewed here [Airbus BCR's](#) or through alternative contractual frameworks 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 ADTS services to you.

Our Binding Corporate Rules allow us to transfer Personal Data within our international organization, and they include a list of countries (below) which are structured to allow us to transfer Personal Data to the countries where we have a presence. Below is a list of countries where Airbus operates:

Algeria, Australia, Belgium, Brazil, Canada, Chile, China, Czech republic, Denmark, Egypt, Finland, France, French Guyana, Germany, Greece, Hong Kong, Hungary, India, Indonesia, Ireland, Italy, Japan, Kazakhstan, Libya, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Norway, Oman, Philippines, Poland, Qatar, Romania, Russia, Saudi Arabia, Singapore, Slovakia, South Africa, South Korea, Spain, Sweden, Taiwan, Tanzania, Thailand, Tunisia, Turkey, United Kingdom, United States of America, Uruguay, United Arab Emirates, Vietnam.

How long will your Personal Data be stored?

We process and store your Personal Data for three (3) years from the date of certificate issuance in accordance with the GDPR or any local data protection laws requirements or as long as it is required to meet our contractual and statutory obligations. After certificate expiry, we archive your personal data for fifteen (15) years before deletion.

As an exception to the retention delays mentioned below, your ID document may be checked to validate your identity, but no copy will be kept or further processed.

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: dataprotection@airbus.com or you can write to the address below:

Airbus SAS, Head of Data Protection, HAP, 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?

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. For instance, if you refuse to provide us your Personal Data, we won't be able to generate digital certificates and you won't be able to use them.

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, including profiling. In the event that we should use such processes, we will if prescribed by law, specifically inform you in advance of this and your rights in this respect.

How to ask for assistance to 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

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Ref: HAP-57-2018

FRANCE: CNIL: Supervisory Authority France

GERMANY: Datenschutz-hamburg: Supervisory Authority for Airbus Operations GmbH
or
Ida Bayern: Supervisory 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