

23 May 2018

Website privacy notice (GDPR Compliant) – AirBorn International Limited.

1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site www.AirBorn.com, including any information you may provide through our site when you enquire about a product or service.

By providing us with your data, you warrant to us that you are over 13 years of age.

AirBorn is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice, please contact our GDPR Officer, using the details set out below.

Contact Details

Our full details are:

AirBorn International Limited
Mercury House
Station Road
Edenbridge, Kent
TN8 6HL
United Kingdom

Name or title of person to contact:

GDPR Officer

Email address: GDPR@AirBornInt.com

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint, so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please

let us know if at any time your personal information changes by contacting us.

2. WHAT DATA WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, home address and post code, telephone number, date of birth, place of birth and gender.
- **Contact Data** may include your email address, company address, and telephone numbers.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, domain name, browser plug-in types and versions, time zone setting and location, operating system and platform, and other technology on the devices you use to access this site.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences, interests and favourites, referring website address in receiving marketing communications from us and your communication preferences.
- **Job applications** may include your CV / Resume, work history, educational details, role you are applying for

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

Sensitive Data

We require your explicit consent for processing sensitive data, so when you submit your details and in these cases we will send you a further communication asking for you to confirm your consent to this processing, for example job applications.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
 - contact us via our website;
 - request resources or marketing be sent to you;
 - give us feedback.
 - make comments via our website
 - apply for a job via our website
- **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using server logs and similar technologies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below :
- **Identify and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text. You have the right to withdraw consent to marketing at any time by emailing us at

GDPR@AirBornInt.com

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at GDPR@AirBornInt.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To register a job application	(a) Identify (b) Contact	Performance of a contract with you
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services</p>
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<p>(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise</p> <p>(b) Necessary to comply with a legal obligation</p>
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our

	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests to develop our products/services and grow our business

Marketing communications

You will receive marketing communications from us if you have:

- requested information from us
- if you have provided us your details
- in each case if you have not opted out of receiving that marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links included within the marketing messaging we send you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at GDPR@AirBornInt.com

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We may transfer your personal data to other AirBorn locations or affiliations globally but only for the purposes delivering a better service to you. Where we do share this information, we will require the receiver to maintain appropriate security to protect your information from unauthorised access or processing.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

The nature of our business (Aerospace and Defence, Space, Medical and Industrial) is that it may be necessary to keep your personal data for longer than 6 years.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Right to lodge a complaint with a supervisory authority. Authority contact information can be found here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at GDPR@AirBornInt.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a

security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.