Privacy policy

Introduction

Airbus SAS and its affiliates (also known as, “Airbus”, or “we” or “us”) appreciate your interest in our products, services and business lines and your use of our websites, portals and “apps” (“Websites”).

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. Personal Data collected during use of our website is processed by us according to the legal regulations valid for the countries in which the Websites is maintained. In addition, our Binding Corporate Rules Airbus BCR’s protect customer and partner data throughout the entire organisation. However, the Websites will include links to other websites or applications which are not necessarily covered by this Information Notice. In this event, we encourage you to carefully read the privacy policies of such websites.

Information Notice index

This Information Notice will inform you of the Personal Data we collect when you access/use the Website; how we use and disclose your data; how you can control the use and disclosure of your data; and how we protect your Personal Data.

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What is Personal Data?

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.

Which sources and what Personal Data do we use?

When you use this Website, Airbus will collect, use and process any Personal Data you provide us (e.g. your name, date of birth, company name etc.) and any information generated as a result of using the Website, such as IP address, duration of visit to the site, the pages you view etc.

The personal data processed are the following:

- IT identifiable data (IP address, Mac address)
- Website usage data (log activities)
- Flight(s) information: flight(s) number, origin airport, connecting airport(s), destination airports, flight date.

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

By using the Websites, Airbus will collect and process your Personal Data in accordance with this Notice. Your Personal Data may be used for the following purposes (hereinafter referred as: the ‘Purposes’):

1. Website Browsers / Administration.
   We use your Personal Data for administrative purposes, including to help us better understand how our customers access and use our websites and applications; to provide reports to prospective partners, service providers, regulators, and others; to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect our customers, partners and us; and to enforce our policies, directives and processes.

   To the extent permitted by law, we may use your Personal Data for marketing and promotional purposes, including communications through email or equivalent electronic
means. For example, we use your Personal Data, such as your email address, to send news and newsletters, special offers, promotions and competitions, or to otherwise contact you about services or information we think will interest you.

3. Communication.
   We use your Personal Data to communicate with you, including responding to requests for assistance. We can communicate with you in a variety of ways, including email and via your social media accounts if you have agreed, and/or text message.

4. Research and development.
   We use your Personal Data for research and development purposes, including improving our websites, applications, services, and customer experience and for other research and analytical purposes dedicated to improving our products, services, businesses, operations and processes.

5. Legal compliance.
   We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.

6. 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 with the relevant privacy information notice.

What is the 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:

1. To comply with contractual obligations.
   When you subscribe to a particular service through the Website, the purposes of processing your Personal Data are primarily determined by that service and we will process your information so that we can provide that service to you.

2. As a result of your consent.
When you have consented to the processing of your Personal Data by us for certain services through the Websites, you can withdraw consent at any time by following the instructions provided in the application process or by contacting us at dataprotection@airbus.com. For further information on the right of withdrawal, please see below Section “Am I obliged to provide my Personal Data?”

3. Within the scope of a legitimate interest.
   On occasion we may not need your consent to use your data, given our legitimate interest to do so but we must inform you that we do this; examples of this are:
   ○ For the analysis and optimisation of the Website.
   ○ For ensuring IT security and the IT operation of Airbus.
   ○ For prevention and investigation of criminal acts
   ○ 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 Website/Process/Application/Newsletter

4. On the basis of Airbus’ legal obligations or in the public interest.
   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.

Who will receive your Personal Data?

We may disclose your Personal Data to the following recipient(s) on a strict need to know basis and for the purposes as outlined in this Privacy Notice:

- 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;
- Our agents, service providers and advisers (e.g. Third party service providers and advisers providing the variety of products and services we need such as IT maintenance and support, procurement services, compliance and security services, etc.);
- Airbus business partners in connection with Airbus activities (e.g. Educational Institutions for recruitment, law/consultancy firms…);
- 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.
• Google Firebase platform
• Adobe Analytics and Adobe Campaigns

Which countries and/or regions will Airbus transfer your Personal Data to?

Airbus processes your Personal Data mostly in the EEA and UK. 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.

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 (so called Standard Contractual Clauses) 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 web-services to you.

Our Binding Corporate Rules allow us to transfer Personal Data within our international organisation for Airbus daily business activity and internal organisation, and they include a list of countries where Airbus Affiliates having signed the BCR and which might have access to your Personal Data if relevant.

Australia, Belgium, Brazil, Canada, Chile, China, Colombia, Denmark, Finland, France, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Italy, Japan, Kazakhstan, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Nigeria, Norway, Oman, Philippines, Poland, Qatar, Romania, Russia, Saudi Arabia, Singapore, Slovakia, South Africa, South Korea, Spain, Switzerland, Taiwan, Thailand, Tunisia, Turkey, United Kingdom, United Arab Emirates, Uruguay, United States of America.

For how long will your Personal Data be stored?

We process and store your Personal Data as long as it is required to meet our contractual and statutory obligations. If your Personal Data is no longer required for the performance of the contractual or statutory obligations, these will be erased on a regular basis unless further processing is necessary, for instance, for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation.

• Identification data and others: maximum of 5 years after the last interaction with the user
• IT identifiable data: the session duration

For further information, see the section below “Cookies”
Security

We use technical and organizational security measures in order to protect the data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

Right to withdraw consent: Where your consent is required, you may at any time withdraw such consent by contacting us at the contact details in section “How to exercise your rights and/or contact Airbus in respect of your Personal Data?”. However, please note that if you withdraw your consent, you may not be able to access and use certain information, features or services as described in section “Are you obliged to provide 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, 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.

Am I obliged to provide my Personal Data?

You may at any time object to the processing of your Personal Data or where your consent is required, withdraw such consent by contacting us at dataprotection@airbus.com; However, please note that if you withdraw your consent, you may not be able to access and use certain information, features or services of the Website.

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.

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. In the event that we should use such processes, we will advise you in advance.

How to ask for assistance to the competent authorities?

If you are unhappy with the way in which your Personal Data has been processed or should you have questions regarding the processing of your Personal Data, you may refer in the first instance to the Airbus Data Protection Officer, who is available for enquiries or complaints, at the following email address: dataprotection@airbus.com

Airbus SAS, Head of Data Protection, HAP, 2 rond-point Emile Dewoitine 31700 Blagnac cedex. France

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

FRANCE: CNIL: Supervisory Authority France

GERMANY: Each German federal state has its own Data Protection Authority that can be found under the following link: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html (see tab „Aufsichtsbehörden für den nicht-öffentlichen Bereich”, i.e. Data Protection Authorities for the private sector)

SPAIN: AGPD. Supervisory Authority Spain

UK: ICO: Supervisory Authority UK
What are cookies?

Cookies are small files that may be downloaded on your device when you access and use our Website. They allow the Website to recognize your device and store information about your preferences or past actions. We use cookies to record the preferences of our users, to enable us to optimize the design of our Website. They ease navigation, and increase the user-friendliness of websites and applications. Cookies also help us to identify the most popular sections of our Website. This enables us to provide content that is more accurately suited to your needs, and in so doing improve our service. Cookies can be used to determine whether there has been any contact between us and your device in the past.

Only the cookie on your device is identified. Personal details can be saved in cookies, provided that you have consented thereto, for example, in order to facilitate secure online access so that you do not need to enter your user ID and password again.

Which cookies do we use?

Please find below a chart with specific information for each cookie that we may use on our Website:

<table>
<thead>
<tr>
<th>Name</th>
<th>Purpose</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google analytics for firebase</td>
<td>Google Analytics collects usage and behavior data</td>
<td></td>
</tr>
<tr>
<td>Firebase Dynamic Links</td>
<td>Get the best available experience for the platform you open your link on. If you open a Dynamic Link on iOS or Android, they can be taken directly to the linked content in your native app. If a user opens the same Dynamic Link in a desktop browser, they can be taken to the equivalent content on your website.</td>
<td></td>
</tr>
<tr>
<td>Firebase App Indexing</td>
<td>Firebase App Indexing gets app content into Google Search.</td>
<td></td>
</tr>
</tbody>
</table>
How can you disable or delete cookies?

When the Cookies we use are strictly necessary for technical reasons, they are marked as “mandatory” on the table above. Those Cookies do not require consent from you. However, if you choose not to accept Cookies that are strictly necessary for the provision of our services provided by our Website, it may result in a reduced availability of such services.

For the Cookies that require a consent from you, please be informed that you can revoke this consent at any time. You can also manage and control the cookies we use, and delete them directly on the Website “cookie preference center” through the cookies settings interface.

For the purpose of statistical analysis, we use analytics tools such as Google Firebase. You may object at any time to the collection and analysis of statistical data regarding your access to and use through the cookies settings interface mentioned above.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Modification of the Privacy Notice

Airbus will update this Privacy Notice from time to time in order to reflect the changes in our practices and services and also to remain compliant to Data Protection Laws and Regulations. We will inform you of any substantial modification in how we process your Personal Data.

December 7th, 2020