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**DATA PROTECTION AND PRIVACY STATEMENT**

*For*

**Job Applicants and Commercial Customers**

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## 1.0 Statement Overview:

Eirtech Aviation Services Limited, EMEA Head Quarters (“HQ”) at 154 Shannon Industrial Estate, Co. Clare, Ireland V14 W984 (company registration number: 359739) and its global subsidiaries (collectively the “Company”, “we”, “our”, “us”) is fully committed as Data Controller, to protecting your “Personal Data” (defined at Clause 3.2 below) and privacy, in full compliance with General Data Protection Regulations 2018 (GDPR). This Data Protection and Privacy Statement (“Statement”) sets out how we collect, use, disclose and retain any Personal Data received and how individuals may co-operate with us about it (“Process”/“Processed”/“Processing”); specifically provided by prospective employees (“Job Applicant(s)”), commercial customers and suppliers and prospective commercial customers and suppliers (collectively “Customers”), [collectively “you”, “your”]; when using the [‘Careers’](#) page and/or [‘Contact’](#) portal of our website. Should we ask you to provide certain information by which you may be identified when using this site, you can be assured that it will only be used in accordance with this Statement.

The intended use of your Personal Data is either purely for a) recruitment purposes, b) related to the sales and marketing of our products and/or services and/or c) receiving products and/or services from vendors (i.e. including sub-contractor companies), including as may be required in completing professional services and/or products to us and/or our clients to the mandatory quality and regulatory standards; and should the aforementioned ever change this Statement will be updated accordingly.

This Statement is effective from 25<sup>th</sup> May 2018 and supersedes any/all other communications we may have made to you on how we Process job applications/customers’ enquiries to the Company.

## 2.0 Purpose, Scope and Consent:

2.1 Job Applicants:	2.2 Customers:
<p>This Statement extends to the Processing of attaining Job Applicants’ Personal Data which is required as part of our impartial and legally compliant recruitment and selection process; and Processed exclusively in determining your potential suitability for any job vacancies within the Company; and thereby help you to make an informed decision on whether you wish to disclose any such Personal Data to us.</p> <p>You should note that failure to provide us with sufficient information may result in our inability to complete our initial assessment, progress further in any recruitment process(es) or form/manage any potential future employment contract/relationship.</p> <p>We will only Process your Personal Data if you have given your consent. By reason of freely submitting your Personal Data in accordance with this Statement through this <a href="#">‘Careers’</a> page of our website (i.e. by proceeding with any job applications and/or enquiry requests through our <a href="#">‘Contact’</a> portal on our website with any requests/enquiries) your Personal Data is entered onto our internal database, you are authorising us to Process, solely for any/all of our recruitment and selection activities.</p> <p>We may also consider/contact you about other potentially suitable/relevant opportunities to your experience/interests within the Company other than that role(s) you originally applied for; and will seek your explicit consent to do so by email or through the Company website; where you will have an opportunity to ‘opt-in’ or ‘opt-out’ of any such contact.</p>	<p>This statement also covers the Processing of attaining Customers’ Personal Data in respect of any of our products and/or services for the purposes of providing a quotation, responding to enquiries, marketing, recommending, requesting, payment, surveying any of our existing, modified or new services and/or products, administering your account, managing any current or future business relationship. It is intended to assist you in making an informed decision(s) as to whether you wish to disclose any such Personal Data to us so as to continue to deliver/enhance our products and services to your satisfaction or to enable you to provide us with information and/or supply/continue to supply your products and/or services to us.</p> <p>The Personal Data provided for this purpose is being requested on a legitimate interest basis and you should note that failure to provide us with sufficient information may result in our inability to complete your enquiry(ies)/request(s) or to form/manage any potential future business contract(s)/relationship(s).</p> <p>By reason of freely submitting your Personal Data in accordance with this Statement, through the <a href="#">‘Contact’</a> portal on our website and/or by email, market research/surveys, such information is entered onto our searchable database and you are thereby authorising us to Process any/all of your requests/enquiries and communicate generally;</p>

If you do not wish to be contacted in this regard, you may let us know separately at any stage by email, post or through the [‘Contact’](#) portal on our website; or where you have agreed you may opt out when we may contact you or at any other time. We may also seek your explicit consent to Process sensitive Personal Data should you progress further in our selection process (refer to section 3.2.1).

In the event that your application results in an offer and acceptance of offer of employment, your Personal Data will become part of your employment record for employment purposes.

(i.e. by telephone and electronic mail) in relation to our products and services that you have requested from us or any of your products and/or services that we may wish to purchase from you.

Under the terms of GDPR 2018, please note that we will seek your explicit consent to use and/or continue to use your Personal Data, as appropriate; specifically for marketing purposes (i.e. by electronic mail, telephone, social media), to make you aware of all/any products and services that may be of interest to you.

Therefore, you may decide how much marketing you wish to accept upon initial contact and at any stage throughout our business relationship; by providing you always with the opportunity to remain ‘opted in’ or to ‘opt out’ from any of our periodic direct marketing newsletters. Equally, you may also [contact us](#) at any other time to subscribe or unsubscribe to any such Company marketing. This will not affect the lawfulness of any Processing we have conducted prior to the withdrawal of your consent.

### 3.0 Principles, Practice and Compliance:

#### 3.1 Our Data Collection

3.1.1 Job Applicants:	3.1.2 Customers:
<p>We normally collect your Personal Data when you apply directly for any individual jobs(s) via our <a href="#">‘Careers’</a> page on our website. Interested candidates must use our <a href="#">‘Careers’</a> page to complete a job application(s); including cover letter and curriculum vitae; which will be channelled directly through to our central Human Resources Department. Personal Data, may also be obtained separately via subsequent general email communications, telephone/voicemail and CCTV footage (i.e. via onsite visits throughout our recruitment and selection process).</p> <p>However, we also reserve the right to select and contract with third party service providers for any specific recruitment services to Process any such related data on our behalf within appropriate security measures. Your Personal Data received and accepted from third party agencies will only be with prior discussion and agreement of your potential suitability for role(s); otherwise, it will be deleted immediately without viewing by us, until appropriate agreement has been reached.</p>	<p>Customers’ Personal Data is obtained via the ‘Contact’ page on our website, email, referrals, MRO shows, conventions, telephone/voicemail, on-site Customer visits, including CCTV footage, formal business meetings, from when initial requests or enquiries are made and subsequently processed by our sales, materials, quality, finance and administration teams. Such contact may be made directly or indirectly.</p>

#### 3.2 Personal Data Content

Personal Data is defined by the General Data Protection Regulations (EU Regulation 2016/679) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. Such data attained by the Company may encompass both individual Job Applicant(s) and Customers’ name, address, contact details [including telephone number, email address, online professional profile address(es)], identification number, salary, job title/occupation, relevant information relating to satisfaction surveys.

Onsite CCTV footage (i.e. containing sensitive biometric and geometric data) is recorded and retained in accordance with GDPR compliance internal procedures; including where there is a legitimate basis and/or for legal reasons, and where reliance on consent is prohibited by EU or member state law.

3.2.1 Job Applicants:	3.2.2 Customers:
<p>Other Personal Data may include Personal Public Service (PPS) number, pseudonyms, educational qualifications' verification, languages. Where the Company either reviews your initial application or progresses to final offer stage we may also seek to collect further data, including interview notes and also sensitive Personal Data from third parties (i.e. pre-employment medicals and references); but only with your explicit consent. You should note that it is your responsibility to attain consent from any referees prior to submitting to us any personal information about them.</p>	<p>The Company may request further information including business name, registration number, payment/bank details, contact information, including email address, demographic information such as postcode, preferences and interests, relevant information relating to offers.</p>

Depending on your use of our website, we may collect some or all of the aforementioned data.

### 3.3 Usage, Storage, Security and Disclosure Controls

We will only collect Personal Data that is absolutely necessary for our legitimate business interests in facilitating an effective recruitment and selection process and any subsequent employment with us; and/or in relation to all aspects of our sales, marketing and procurement, including payment, quality and customer service processes; and where such interests are not overridden by the right to conduct/complete such processes, as appropriate.

We are committed to ensuring that your Personal Data is secure and selected employees of the Company [i.e. including management and authorised employees within their appropriate functional area(s)] have access to Personal Data). In an effort to prevent unauthorised access or disclosure, we have implemented appropriate physical, electronic and managerial procedures to safeguard and protect the information we collect online to established GDPR standards. Such security measures include firewalls, IP anonymisation, password protection and website SSL Card/encryption to verify the website's authenticity for electronic data between sender and receiver and lockable / restricted access.

All Personal Data recorded by the Company (for Job Applicants and Customers alike) are audited at least once every twelve (12) months, or sooner as may be necessary, so that we maintain accurate and relevant information only and strictly for no longer than is absolutely necessary. Approved Vendor lists are also audited and updated monthly to ensure compliance with ISO 9001 is maintained at all times. CCTV footage will be retained for twenty eight (28) days; after which it will normally be overridden unless there are other legitimate and/or legal reasons requiring such data to be retained for longer periods. Where no longer required, any unnecessary data (both hard and/or soft copy versions) will be destroyed/overridden safely and confidentially in accordance with the Company's GDPR compliant internal procedures.

3.3.1 Job Applicants:	3.3.2 Customers:
<p>If you are not hired by the Company after completion of our recruitment and selection process for any vacant position, under the terms of our internal procedures we will normally retain your Personal Data in a central and secure location (manually and also electronically on our internal applicant tracking and email management systems), for up to a total maximum period of fourteen (14) months from the date of submission.</p> <p>During these fourteen (14) months your Personal Data will remain in a confidential and secure manner for enquiry handling/reference and/or possible consideration for other potential opportunities within the Company; but otherwise and after which will be destroyed safely and completely without further notification or reason.</p>	<p>We will retain Personal Data for Customers specifically for the duration of any legitimate continuing business relationship/interest, including in the marketing and sales of our products and services.</p> <p>We also share information with sub-contractor companies that may collaborate in the delivery of some of our services or for marketing purposes [within or outside the European Economic Area ("EEA") - i.e. member states of the European Union, together with Norway, Lichtenstein and Iceland, where compliant with Data Protection legislation].</p>

Should you decide to re-apply for another vacant position after completion of this timeframe, you will be required to complete and submit a new application, including updated curriculum vitae.

Where you may wish to apply for more than one role, you will be required to complete separate applications per role; to ensure we have the relevant accurate and up to date Personal Data, as appropriate. Our recruitment process activities will be impacted by the information provided. Your Personal Data will be shared with our Human Resources Department and relevant hiring manager(s) of the respective country(ies) that you applied to. Following collection of your Personal Data, the Company undertakes to use, disclose and retain and in any event that we should cease progression of your job application(s), your Personal Data may also be disclosed to subsidiaries of the Company regarding other possible opportunities, but only with your prior explicit written consent.

Job applications for vacant positions throughout Dublin, Shannon, Belfast and Singapore will be managed and stored exclusively from our EMEA Head Quarters in Shannon ("HQ"). For any roles that may be outside of our HQ jurisdiction, Personal Data from Job Applicants will be Processed within any such individual offices.

To manage the Company's interaction with Customers, your Personal Data is/will be stored within the EU, via our online customer relationship management (CRM) system, internal central project register spreadsheet; Materials Relationship Planning (MRP) system, internal approved vendor list, internal calibration log, internal central visitor register and email via MS Outlook 2016.

### 3.4 How we use Cookie Technology

The Company uses Google Analytics, a web analytics service made available by Google, Inc. ("Google"). Google Analytics uses "cookies", which are small text files and at the request of our server are placed on your computer's hard drive.

Once you agree for the file to be added, the information generated by the cookie helps analyse web traffic or your visit/use of a particular site (including your IP address), and will be transmitted and stored by Google servers. Cookies allow web applications to respond to you as an individual.

The web application can tailor its operations to gather data on your interests and save your personal preferences so that you do not have to re-enter each time you visit the website. In certain circumstances, it may facilitate the Company to use data to contact you in relation to any job vacancy that you accessed that may be of interest to you.

Overall cookies help us to provide you with a better website, by enabling us to monitor which pages of our website that you find useful and which you do not. A cookie in no way provides us with access to your computer or any information about you, other than the data you choose to share with us.

Before cookies are placed on your computer or device, you may choose to accept or decline, following an automatic prompt which will appear requesting you to do so. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you would prefer, however this may prevent you from availing full advantage of our website. The Company has set a fixed time limit of twenty six (26) months before automatic expiry.

The Company has a standard SSL card with IP anonymisation switched on at all times, which enables the Company to attain statistics without pinpointing individual sessions on to our website. You should note that neither the Company nor Google will link or seek to link an IP address with the identity of the computer user.

The following cookies may be placed on your computer or device:

Cookie Name	First or Third Party	Source	Purpose	Strictly Necessary (Y or N)	Expiration Time
"_ga"	Third	Originates from Google Analytics	To keep a record of visitor statistics.	N	2 (two) years
"_gat"	Third	Originates from Google Analytics	To throttle request rate.	N	1 (one) minute
"_gid"	Third	Originates from Google Analytics	To keep a record of visitor statistics.	N	1 (one) day
"_ok"	Third	Olark	Uses for security purposes.	Y	Session
"_okbk"	Third	Olark	Contains software state information.	N	Session
"_okdetect"	Third	Olark	Group ID the visitor is locked to.	N	Session
"_oklv"	Third	Olark	Used to improve caching of software.	Y	Session
"Hblid"	Third	Olark	Identifies a unique visitor between visits.	N	2 (two) years
"Olfsk"	Third	Olark	Maintains message history across pages.	Y	2 (two) years
"wcsid"	Third	Olark	A session identifier used to keep track of a single chat session.	Y	Session

### 3.5 Links to other sites

Our website may contain links to enable you to visit other websites of interest easily; which are exclusive to us. Once you use these links to leave our website we do not have any control over that other website(s) and cannot be responsible for the protection and privacy of any information provided whilst visiting any such other site(s). We would advise you to check the privacy policies of any such websites before providing any data to them.

### 3.6 Controlling your Personal Data

#### 3.6.1 Accessing, Accuracy and/or Deletion of Personal Data

Under Article 15 of the GDPR 2018, you have the right to make a Data Access Subject Request "DASR", to obtain a copy of any Personal Data relating to you that is kept on the Company's computer system, in a structured manual filing system or intended for such a system by the Company. You may contact us at any time to request access/copy of your personal data, which we hold about you; however, such requests may be subject to certain restrictions in some circumstances. To do so you must submit your request in writing by post or email to the Company's GDPR Administration Officer(s) [refer to Section 4.0].

You are asked to be as specific as possible in relation to the Personal Data; and in the interests of safeguarding the documentation and to ensure it is given to the correct person, you will be asked to provide evidence of your personal identification.

Unless there are manifestly unfounded or excessive requests, an administration fee may apply; but otherwise normal requests will be free of charge and submitted to you within thirty (30) days after requested; or alternatively provide a reason why a refusal may be necessary (refer to the Company's GDPR Administration Officer(s) for any further information). If requests are numerous or complex, an extended timeline of a further two (2) months may be deemed appropriate. As well as updating any requests you may make to correct any inaccurate, incorrect or incomplete data, we may also contact you periodically to review such Personal Data.

You may also receive information about the categories and purpose of Processing your Personal Data and to whom your Personal Data has been transmitted. It will be restricted use for the main purpose only intended or supplied. Should your Personal Data be incorrect and/or deemed to be unfairly obtained, you should explain in writing by email or post to the appropriate Company GDPR Administration Officer(s), outlining why and the Company will respond within thirty (30) days; either confirming the change or possible reason for refusal. If you should object to the manner in which your Personal Data is Processed, you may also at any time request to fully erase from our records.

3.6.2 Data Usage, Objections and Decision Making

As well as interacting with you in writing, online or by telephone to evaluate further either your job application(s) further, or products and services we may also use your Personal Data to assess/survey your experiences of our recruitment, sales and/or marketing process(es), where relevant with a view to making any further enhancements/changes as may be deemed appropriate over time. All such relevant information for jobs may be utilised and maintained by our human resources, sales and marketing teams respectively, as applicable within the appropriate offices as set out in Section 3.1 and in accordance with GDPR regulations. You have the right to object and the Company this confirms that by forwarding such information, you will not be subject to automated decision making or profiling by the Company.

3.6.3 Transfer of Personal Data

<b>3.6.3.1 Job Applicants:</b>	<b>3.6.3.2 Customers:</b>
<p>In any situations where a job application(s) is received for another location(s) outside of the Company's job vacancy(ies) designated jurisdiction(s), that application(s) will be transferred, via email in PDF format and password protected, to the appropriate location(s) for Processing; following which the application(s) will be deleted by the first recipient.</p> <p>We will notify you if transferring to a subsidiary of the Company outside of the EEA; and should this be required, the Company will act appropriately to ensure the data has the same level of protection as it does within the EEA.</p> <p>You also have the right to data portability enabling you to require us to electronically transmit your Personal Data to another organisation, as requested.</p>	<p>As the Company operates internationally, it may be necessary in the course of business to transfer Personal Data within the Company and to other group companies; in countries outside the European Economic Area, which do not have comparable data protection laws.</p> <p>The transfer of such data may be necessary for administration of sales, marketing and procurement purposes. Where this may be necessary, the Company will take necessary steps to ensure that the data has the same level of protection as it does inside the EEA. You also have the right to data portability enabling you with the right to require us to electronically transmit Personal Data to another organisation, as requested. The Company will only transmit to companies that agree to guarantee this level of protection and will notify you should this be a requirement.</p> <p>Any such Personal Data may be transferred by email and password protected in all/any formats including the Company's CRM system, internal project register spreadsheet and MRP System.</p>

#### 3.6.4 Complaints

If for any reason you may not be satisfied with the Processing of your Personal Data, you reserve the right to make a complaint to the Data Protection Commissioner tel: +353 761 104 800 | email: [info@dataprotection.ie](mailto:info@dataprotection.ie) and/or may contact the Company's GDPR Administration Officer(s) (refer to Section 4.0).

#### 3.6.5 Breach of Personal Data

Mandatory breach notification has been introduced under GDPR 2018, which means that unless anonymised or encrypted must be reported to the Data Protection Commissioner within seventy two (72) hours. Essentially this may result in most data breaches, any breaches that are likely to cause harm to an individual (including breach of confidentiality or identity) must also be reported to the individuals affected.

**Any/all breach(es) or indeed any suspected breach(es) must be immediately reported to the Company's GDPR Administration Officer(s) for assessment.**

#### 3.7 Future Reviews / Changes

We reserve the right to review this Statement periodically and where necessary, due to changes in business operations or applicable new employment legislation; to make any future changes to our practices and this Statement, in the management of your Personal Data. Any updated versions of this Statement will be posted on our website so that you are consistently aware of what and how data is Processed. We recommend that you check our website from time to time to ensure that you remain satisfied with any such changes; and any/each time you send us new or additional information. If your Personal Data is to be used in a manner significantly different from that stated in this Statement, or otherwise disclosed to you at the time it was collected, we will notify you by email and you will be provided with the option as to whether you wish it to be used in the new manner.

#### 4.0 **Further Information:**

In addition to the ['Contact'](#) page on our website, should you have any enquiries, concerns or requests regarding this Statement, how your Personal Data is Processed, to subscribe or unsubscribe from any of our marketing campaigns and/or to 'opt-in' or 'opt-out' on contacting you about other job opportunities within the Company other than which you apply for, you may also contact the appropriate Company GDPR Administration Officer(s) in writing to:

Eirtech Aviation Services Limited (HQ), 154 Shannon Industrial Estate, Co. Clare, Ireland, V14 W984;  
OR by email to: [gdpr.hq@etas.ie](mailto:gdpr.hq@etas.ie).