

## **General Data Protection Regulation (GDPR) Statement of Compliance Procedures**

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Checked and validity of content remains unchanged

### **1. PURPOSE & DEFINITIONS:**

- 1.1. This privacy policy applies to the Hawker Pacific Aerospace (HPA) platform provided by Lufthansa Technik AG, Weg beim Jaeger 193, 22335 Hamburg, Germany ("LHT AG", "we" or "us"), and is intended to **inform users about the collecting and processing of their personal data.**
- 1.2. The data controller in the sense of the European data protection laws is **Lufthansa Technik AG.**
- 1.3. Personal data relates to any information that is correlated to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly by reference; such as a **name, an identification number, any location data, and an online username, as well as specific factors such as physical, physiological, genetic, mental, economic, cultural or social attributes of said natural person.**
- 1.4. Processing activities are any operations performed on personal data, whether or not by automated means; such as **collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, making available, alignment, combination, restriction, erasure or destruction.**

### **2. PRINCIPLES OF DATA PROCESSING:**

- 2.1. Processed lawfully, fairly and in a transparent manner in relation to the data subject (refers to '**lawfulness, fairness, and transparency**' of EU-GDPR Art. 5 (1))
- 2.2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (refers to '**purpose limitation**' of EU-GDPR Art. 5 (1))
- 2.3. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, not be considered to be incompatible with the initial purposes (in accordance with EU-GDPR Art. 89 (1))
- 2.4. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (refers to '**data minimization**' of EU-GDPR Art. 5 (1));
- 2.5. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (refers to 'accuracy' of EU-GDPR Art. 5 (1))

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- 2.6. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (refers to 'storage limitation' of EU-GDPR Art. 5 (1))
- 2.7. Further storage of personal data may be kept for longer periods as long as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes subject to implementation of the appropriate technical and organizational measures required by this regulation in order to safeguard the rights and freedoms of the data subject (in accordance with EU-GDPR Art. 89 (1))
- 2.8. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (refers to 'integrity and confidentiality' of EU-GDPR Art. 5 (1))

### **3. COLLECTING AND PROCESSING OF PERSONAL DATA:**

HPA's website does not collect data automatically from visitors. Visitors are required to complete desired forms. Visitors are directed to read HPA Legal Terms prior to submitting completed forms within the HPA website.

#### **3.1. Data processed When Completing Online Forms**

3.1.1. During the completion of the desired form you will be asked to provide mandatory information which may include the following personal data:

3.1.1.1. Your name

3.1.1.2. Your email address/ phone number

3.1.1.3. Your employer/company

3.1.2. This mandatory information is marked as such. In the event a registration has not been completed and submitted, the data will not be saved.

#### **3.2. Data processed while using HPA Website**

3.2.1. Any form that is completed and submitted will have the information sent to the relevant HPA contact.

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### **4. PURPOSE OF DATA PROCESSING:**

We may evaluate, retain and use the information provided to us and the data generated from the use of our website only and exclusively limited to the following purposes:

#### **4.1. Offer Our Service**

The main purpose to process personal data is to ensure the functionality of HPA. If you use HPA, the above mentioned personal data will be used to assist your requests. For example, users who are authorized by a company to see your request will be able to see and access the information you share as well as your contact details on the HPA form.

#### **4.2. Prevent Abuse and Legal Defense**

To comply with our legal requirements, enforce our Terms & Conditions, respond to claims that violate the rights of others, or protect anyone's rights, property or safety, we might use the personal data provided by your side.

#### **4.3. Keep You Informed**

We may contact you to ensure that the information we have in our records is accurate or when in need of additional information to complete your form.

#### **4.4. Improve Our Services**

In order to improve our service, we may contact you to receive feedback and comments from you about our services. We may also contact you to ask for your satisfaction rate.

### **5. PLACE OF DATA PROCESSING:**

HPA processes all personal data at its headquarters in Sun Valley, California.

#### **5.1. Transfer of Data to Third Parties**

Your data will only be transferred to third parties if we or a third party have a legitimate interest in the transfer or you granted us your consent to the transfer. Additionally, personal data might be transferred to third parties if we are obliged to transfer the data by German statutory provisions or by an enforceable order of a German court or administrative authority.

#### **5.2. External Service Providers**

We reserve the right to appoint external service providers for the collection and use of personal data. These service providers will only have access to data they need for the performance of their services. Service providers will generally be appointed as commissioned data processors which are only allowed to process the personal data according to our instructions.

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### 5.3. Duration of Storage

We will store your personal data as long as we have a legitimate interest in the storage, as long as you are employed. In all other cases we will delete your personal data with the exception of those data that we need to store further in order to comply with contractual or statutory retention periods. Data which is only kept because it is subject to a retention period will be blocked for other uses.

## **6. RIGHTS OF THE DATA SUBJECT**

You have the right of access to your personal data and - if certain prerequisites are present - also to correction, to erasure, to limitation of the data processing and - starting at 25 May 2018 - a right to data portability.

In case you gave us your consent for the processing of data you may withdraw your consent at any time. Please address your request to:

### 6.1. Access to Data

You have the right to be informed whether your personal data is being processed by us, and, if this is the case, to what extent. If you require information, please contact Human Resources: 1-(818)-765-6201.

### 6.2. Rectification of Data

You have the right to rectification of inaccurate personal data. Please update your personal information immediately if it changes or is inaccurate. The personal data which is relevant for the completion of a form like your name, your company or your email address can only be modified by authorized HPA system administrators. In order to request the modification of the above mentioned and further data please send an email to Human Resources: [recruiting@hawker.com](mailto:recruiting@hawker.com).

### 6.3. Erasure of Data

You have the right to erasure of your personal data processed by HPA (refers to 'right to be forgotten' of the EU-GDPR). In case you want to delete your personal data please send an email to [recruiting@hawker.com](mailto:recruiting@hawker.com). We will close your account and make sure that your personal data is deleted as soon as reasonably possible. The data related to your activities as described under section 1.2 of this policy will be anonymized after the closure of your account.

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### 6.4. Restriction of Processing of Data

You have the right to demand a restriction of processing of your personal data under certain preconditions. At any time, you may ask that your preferences as to the type and amount of communication that you receive from us are modified. For claims beyond such case, please contact Human Resources: [recruiting@hawker.com](mailto:recruiting@hawker.com).

### 6.5. Data Portability

Starting from the 25th of May 2018 you will have the right to Data Portability, i.e. to receive all personal data that you provided to us in a structured format for your use. In case you want to receive an overview of your personal data which has been collected in accordance with section 1 and 2 of this policy please send an email to Human resources: [recruiting@hawker.com](mailto:recruiting@hawker.com). We will then provide you the requested information within a reasonable period of time.

### 6.6. Objection

You have the right to object at any time to processing of personal data concerning you. You can do so by sending an email to Human Resources: [recruiting@hawker.com](mailto:recruiting@hawker.com). We will then no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you as the data subject or for the establishment, exercise or defense of legal claims. You especially have the right to object if personal data concerning you is processed for direct marketing purposes.

### 6.7. Automated Individual Decision-making, Including Profiling

HPA does not implement any automated individual decision-making, including profiling.

## **7. DATA SECURITY**

7.1. As a member of Lufthansa Technik Group, HPA takes reasonable technical and organizational measures to guard against unauthorized or unlawful processing of the information collected and against accidental loss or destruction of, or damage to, your personal data.

7.2. While no system is completely secure, we believe the measures implemented by our side reduce the likelihood of security problems to a level appropriate to the type of data involved. This includes encrypting the transmission of sensitive information using transport socket layer technology, as well as safeguarding your data through firewalls, data encryption and authentication procedures in order to maintain the security of your active session and to protect your personal data and the Services from unauthorized access.

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### 8. COOKIES, TRACKING AND WEB ANALYSIS TOOLS

A cookie is a small element of data that can be exchanged between an Internet site and a client's browser. It can be stored on either side to enable the Internet application to recognize the client on return. You can set your browser to notify you when you receive a cookie, and you may choose to accept the cookie or not. If you do not accept the cookie, the corresponding Internet page may not be able to be accessed. If you accept the cookie, you can delete it after the session.

#### 8.1. Behavioral Remarketing

Lufthansa Technik AG uses remarketing services to advertise on third party web sites to you after you visited our Service. We and our third party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

#### 8.2. Social Plugins

HPA does not use social plugins.

### 9. COMPLAINTS TO DATA PROTECTION AUTHORITIES

9.1. Until May 24th 2018 In Europe the following legislation applies to the subject of data privacy:

9.1.1. DIRECTIVE 95/46/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

9.1.2. For Germany this directive is implemented by the "Bundesdatenschutzgesetz"

9.2. From May 25th 2018 the following European legislation applies to the subject of data privacy:

9.2.1. REGULATION (EU) 2016/679 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, and repealing Directive 95/46/EC (General Data Protection Regulation)

9.2.2. HPA has appointed Lloyd Cruz as the Data Protection Coordinator:  
Phone: 1 (818)-765-6201x216  
E-Mail: [lloyd.cruz@hawker.com](mailto:lloyd.cruz@hawker.com)

9.3. In addition to the above stated rights you have the right of an appeal at a regulatory authority. The regulatory authority responsible for Lufthansa Technik AG is:

9.3.1. Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit  
Klosterwall 6  
Block C  
20095 Hamburg

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Phone: +49 40 42854-4040  
Fax: +49 40 42854-4000  
E-Mail: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de)

### 10. CONTACT INFORMATION

If you have comments or questions, any concerns or a complaint regarding the collection and use of your personal data, please feel free to contact us @ 1-(818)-765-6201 Extension: 216.

### 11. CHANGES TO THIS STATEMENT OF COMPLIANCE

We may change the terms of this Statement of Compliance from time to time. If a change in terms would reduce any protection with respect to information previously collected by us, then such information will continue to be dealt with in accordance with such protection that was contained in our policy that was in effect at the time of collection.