



Information note about data confidentiality under the GDPR.

Introduction

ATR undertakes, within the framework of its activities, to ensure the protection, confidentiality and security of all your personal data while respecting your privacy.

This information note is intended to inform you about the measures implemented to process your personal data. This note also informs you of the personal data protection rights that you can exercise.

ATR is committed to protecting the data of individuals in accordance with the European Data Protection Regulation 2016/679 of 27 April 2016 (GDPR) and all applicable national laws and regulations on the protection of personal data.

This information note is applicable for the following data subjects: customers; suppliers and any user of the ATRactive platform (national authorities).

Please note that specific Privacy Notices can apply on some applications available through ATRactive. You can consult them on the *Legal Documents* or *Terms & Conditions* page.

Processing of your Personal Data

A. What is personal data?

Personal data is any information relating to an identified or identifiable natural person. An "identifiable natural person" is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an on-line identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

B. What will your data be used for (purpose of processing)?

Your personal data is used in the context of a processing operation whose purpose is to offer users of the platform, a unique access to the various online supports and applications offered by ATR.



C. What data will be collected and how?

Within the framework of the defined processing, the data that are collected are the following:

- Identity data
- Professional data

The data used are from :

- Elements that you or your company's ATRactive administrator may have given to ATR as part of your registration on the ATRactive platform.

The collection of your data is necessary to carry out the defined processing.

Certain data are optional within the framework of this processing. These data are the following: country where the user is usually located (optional field on the ATRactive platform).

Failure to provide the data may have certain consequences:

- Impossibility to access certain functionalities of tools, services.

D. On what legal basis is the processing of your personal data?

ATR relies on an appropriate legal basis that legitimizes the processing. This legal basis is as follows:

- Your consent for one or more defined purposes;
- The proper execution of the commercial contract between you and ATR or of pre-contractual measures taken at your request requiring the processing of your data.

E. For how long does ATR keeps your Data?

ATR processes and keeps your personal data for as long as necessary to fulfill the purpose of the processing in accordance with our contractual and regulatory obligations.

In the context of the data processing concerned by this information notice, the retention period has been set at 3 years (14.3 T&C).

Recipients of your data

A. Who receives your personal data?

Within ATR, your data is processed by the following authorized persons:

- ATR personnel in the following departments and services: Programs, Commercial, IT;
- ATR's partners: AIRBUS and LEONARDO;
- Subcontractors and temporary workers processing data on behalf of ATR;
- National or international authorities within the framework of the application of the law in force or administrative or judicial procedures (aeronautical authorities).



B. Transfer of your data : Are your personal data transferred to a third country outside the European Union?

ATR processes your data mainly within the European Union. In very exceptional cases, data are transferred outside the EU.

The part of the processing carried out outside the European Union is as follows: Sharing customer activity via the ATR Customer portal with their dedicated ATR representative who may be based in the ATR center abroad.

C. In which countries does ATR transmit personal data?

Your personal data is transferred to subsidiaries in the following third countries: United States, Singapore, India.

For transfers outside the EU described above, the protection of your data is guaranteed by the following appropriate legal means: Standard contractual clauses adopted between the parent company and the subsidiaries.

Your rights regarding the processing of your data

A. What are your rights and how do you exercise them?

You may at any time exercise your rights related to the protection of your personal data :

- Right of access to the details of the information held by ATR concerning you.
- Right to rectify your data: You may ask ATR to modify any inaccurate information concerning you.
- Right of oblivion: you have the right to request the deletion of your data, in particular when the data is no longer necessary for processing.
- Right to limit the processing of your data: you have the right to freeze the use of your data by ATR, i.e. ATR will no longer carry out the intended processing of your data but will keep them. For example, if you contest the accuracy of the data used or if you object to the processing, ATR will verify and examine your request for a certain period of time. During this period, you have the possibility to ask ATR to limit the use of your data.
- Right to the portability of your data: you have the right to receive your data in a structured format, commonly used and readable by computer tool or to request the transmission of your data to another data controller.
- Right to object to the processing of your data: you may at any time object to the processing of your data for reasons relating to your particular situation (justifications to be sent to ATR).
- Right of withdrawal of consent: you may request that the processing of your personal data be stopped for reasons relating to your particular situation.



NOTA: The exercise of rights may be limited by regulation: non legitimate reasons, protection of the rights of another natural or legal person, etc. ATR reserves the right to assess your request in accordance with the regulations.

B. How to contact ATR regarding your personal data?

You may contact ATR to exercise your rights or for any question concerning the protection of personal data.

In order to exercise your rights, your request must include proof of your identity by any means. For example, you may be asked to provide a photocopy of an identity document bearing your signature.

ATR reserves the right to assess your request in accordance with the regulations.

You may contact the ATR Data Protection Representative at the following email address: dataprotection@atr-aircraft.com or send a postal mail to the following address

ATR

HR Department

To the attention of the Data Protection Representative

1 allée Pierre Nadot

31712 Blagnac

C. How can you contact the supervisory authorities?

If you consider, after having contacted us and exchanged information, that your Computer Rights and Freedoms are not respected or that the treatment defined does not comply with data protection rules, you can make a complaint online to the CNIL or by post.

France :

Commission Nationale de l'Informatique et des Libertés (CNIL).

3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

Tel: +33 (0)1 53 73 73 22 22

<https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil>

Italy :

Garante per la Protezione dei Dati Personali (GPDP).

Piazza Venezia n. 11 - 00187 Roma

Tel: (+39) 06.696771

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