



## PRIVACY INFORMATION NOTICE

### related to Airbus Pilot Cadet Training Programme Services

*Issued on June, 2021*

#### Introduction

Airbus Flight Academy Europe (also known as “we” or “us”) appreciates your interest in the Airbus Pilot Cadet Training Programme.

The Airbus Pilot Cadet Programme has been designed to allow someone with no flying experience to undergo the Airline Transport Pilot integrated licence with a view to becoming a commercial airline pilot.

The Airbus programme is delivered via a network of Airbus standardised & approved flight school members: the Airbus Flight Academy network.

The registration and assessment process can include different steps :

- First contact for information
- Assessment / Screening phase (online and on site)
- Selection and onboarding in the Airbus Pilot Cadet Training Programme

Your privacy is important to us and we want you to feel comfortable when contacting Airbus Flight Academy Europe or when applying for the Airbus Pilot Cadet Training Programme, jointly managed and operated with Airbus SAS.

Airbus Flight Academy Europe 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 the *Airbus Pilot Cadet Training Programme* processes.

However, the assessment and/or onboarding steps might include links to specific applications with associated privacy information notice. In this event, we encourage you to carefully read such privacy policies.

This Privacy Notice will inform you of the Personal Data we collect when you contact Airbus Flight Academy Europe for further information on the Airbus Pilot Cadet Training Programme via the relevant contact form on the Airbus Services website or via our generic email address as well as during the Screening assessment and the Airbus Pilot Cadet training delivered in the relevant Flight School partner; how we use and disclose your Personal Data; how you can control the use and disclosure of your Personal Data; and how we protect your Personal Data.

#### Which sources and what Personal Data do we use?

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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.

The Personal Data we might process depending on how far you will go in the Airbus Pilot Cadet Training Programme under this Privacy Notice are as follows:

- ❑ Identification data (including full name, address, postal code, city, country of residence, nationality, telephone number, email address, date of birth)
- ❑ IT data (Digital activity data (e.g. IP address, MAC address, logs, account information such as role and permissions, settings and preferences, login, password)
- ❑ Professional data (including assessment test results if applicable, candidate number, Approved Training Organization center name, PPL Licence number (if applicable))

We may collect this Personal Data cumulatively:

- **directly** from you by email and/or by filling the Airbus Pilot Cadet Training Programme contact form in Airbus services.com and/or any information provided when accessing any screening or training tools.
- **Indirectly** from the company for which you are working for or from Flight School partners that you have contacted to enter into the Airbus Pilot Cadet Training Programme.

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

By submitting the contact form through Airbus Flight Academy Europe website, by sending email to Airbus Flight Academy Europe and/or by entering into Airbus Pilot Cadet Training Programme for the screening phase (online or onsite) or for undergoing the training program within Airbus Flight Academy Europe, we might collect and process your Personal Data for the following purposes depending on how far you will go in the Airbus Pilot Cadet Training Programme (hereinafter referred as: the ‘Purposes’):

- *To communicate with you* regarding your interest in the Airbus Pilot Cadet Training Programme services, including responding to your request for information and/or for assistance during the Program. We could possibly use your e-mail address and postal address as well to inform you about Airbus Pilot Cadet Training Programme news, next events, screening sessions, new flight school opening, products, promotional offers and occasional offers by partners third parties we think might interest you  
If you do not wish to receive those offers, you can unsubscribe at any time by sending “Unsubscribe” or clicking on the link “Unsubscribe” at the bottom of every email.
- *To comply with Approved Training Organization requirements* in order to assess your skills, competences, qualifications and your eligibility for the Airbus Pilot Cadet Training Programme (if applicable) in the course of the screening assessment phase
- *For Legal compliance.* We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.
- *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.
- *For Website Browsers / Administration.* We may use your Personal Data for administrative and account management purposes, to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect you, our partners and us; and to enforce our policies, directives and processes.
- *For Research and development.* We may use your Personal Data for research and development purposes, including improving our websites, applications, training services, and customer experience and for other research and analytical purposes dedicated to improving our products, services, businesses, operations and processes.

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

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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 to this before further Personal Data processing and provide you the relevant privacy information notice.

### What is the legal 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:

For Cadets joining the Airbus Cadet Pilot Training Programme at their own initiative:

**As a result of your consent during the screening phase.**

When you have consented to the processing of your Personal Data by us for the Airbus Pilot Cadet Training Programme in particular to be part of the screening phase, via the Airbus Flight Academy Europe website and/or further online and onsite screening tools, you can withdraw consent at any time by following the instructions provided in the application process or by contacting us at [data-protection@airbus-flight-academy.com](mailto:data-protection@airbus-flight-academy.com). For further information on the right of withdrawal, please see below Section *“How to exercise your rights and/or contact Airbus in respect of your Personal Data?”*

When you have consented to the processing of your Personal Data by us for assessing your skills; competences and qualifications in the course of training services delivery, you can withdraw consent. For further information on the right of withdrawal, please see below Section *“What are your rights and how to exercise them?”*

**For the duration of the training contract if selected further to the screening phase**

At the end of the screening phase if selected, Airbus Flight Academy Europe and you will enter into a dedicated training contract to cover the training program phase.

**Within the scope of a legitimate interest**

- For Information, system, network and cyber security within Airbus Flight Academy Europe and Airbus
- For fraud detection and prevention and investigation of criminal acts.
- For Compliance with foreign law, law enforcement, court and regulatory bodies' requirements

For Cadets joining the Airbus Cadet Pilot Training Programme at your company's initiative:

**Within the scope of a legitimate interest.**

Taking into account the minimum privacy impact for you, the processing of your personal data is necessary for the following legitimate interest:

- For the screening performance and delivery of appropriate training services as agreed with the company for which you are working for
- 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 Flight Academy Europe and Airbus
- For Communications, marketing and intelligence

For all Cadets:

**On the basis of Airbus Flight Academy Europe/Airbus legal obligations**

Airbus Flight Academy Europe, like any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for Airbus Flight Academy Europe in order to comply with local aviation authority regulations, notably EASA Part FCL.

### 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:

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- Airbus SAS
- Authorized persons working for or on behalf of Airbus Flight Academy Europe, including our agents, service providers and advisers providing the screening tools and/or training tools
- Other authorised third parties in connection with any merger, reorganization, a sale of some or all Airbus Flight Academy Europe assets, or a financing or acquisition of all or a portion of our business by another company.
- Law enforcement or government or public authorities or other legal processes 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.

### Which countries and/or regions will Airbus Flight Academy Europe transfer your Personal Data to?

We process 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, including entities outside the EEA when the applicants or Cadet will access to screening tools where the data are mostly stored in UK

If applicable, this transfer is subject to appropriate safeguards, within Airbus Flight Academy Europe through the legal framework of our Binding Corporate Rules, that can be found on our website [www.airbus.com](http://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.

Our Binding Corporate Rules allow us to transfer Personal Data within our international organization for Airbus Flight Academy Europe daily business activity and internal organization, 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.

### How long will your Personal Data be stored?

We process and store your Personal Data for what relates to professional data and regulatory requirements for aviation training for at least 5 (five) years for flight training from the date of our last interaction with you in accordance with the GDPR or any local data protection laws requirements or as long as it is required to meet our contractual and statutory and regulatory obligations. For any data not relevant to keeping track of training performed as per regulatory requirement, your Personal Data will be stored for maximum 2 (two) years) and then be deleted or archived.

### What about the security of your Personal Data?

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

### What are your rights?

Under some circumstances provided by law, you may at any time exercise your data protection rights as listed below by contacting us at the contact details in section “*How to exercise your rights and/or contact us in respect of your Personal Data?*”:

- **Right to access/obtain a report detailing the information held about you:** You have the right to obtain confirmation as to whether or not your Personal Data is being processed by Airbus and if so, what specific personal data is being processed.

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- **Right to correct Personal Data:** You have the right to rectify or request to have rectified any inaccurate Personal Data concerning you.
- **Right to be forgotten:** In some cases, for instance, when the Personal Data is no longer necessary in relation to the Purposes for which they were collected, you have the right for your Personal Data to be erased.
- **Right to restrict the processing of your Personal Data:** You have the right to restrict the processing of your Personal Data, for instance when the processing is unlawful and you oppose the erasure of your Personal Data. In such cases, your Personal Data will only be processed with your consent or for the exercise or defense of legal claims.
- **Right to data portability:** You have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit those Personal Data to another data controller.
- **Right to object:** In some cases required by law, you may ask us to stop processing your Personal Data.
- **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?*”.
- Right to get information about the main characteristics of the logic involved in the automated decision-making process, except when those main characteristics are secrets protected by law.

## How to exercise your rights and/or contact Airbus Flight Academy Europe 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 Flight Academy Europe Data Protection Officer, who is available, at the following email address: [data-protection@airbus-flight-academy.com](mailto:data-protection@airbus-flight-academy.com) or you can write to the address below:

Airbus Flight Academy Europe Aéroport Angoulême, 249 rue Jean Mermoz, 16 430 Champniers, France.

In case of doubt of your identity, we may ask you to justify it by enclosing a copy of any identity document.

## Are you obliged to provide your Personal Data?

Under certain circumstances, when some Personal Data is necessary to offer training services or to comply with legal obligations, any failure to provide the requested Personal Data may result in us not being able to fulfill our legal obligations or to achieve the expected results and thus to provide the relevant services.

## Are your Personal Data the basis for automated decision-making, including profiling?

Profiling might occur

- when we process your Personal Data to assess your eligibility for an Airbus Pilot Cadet training programme and thus evaluate your skills, competences and qualifications and whether you fulfill the necessary prerequisites to enter a given course.
- to keep you properly aware as per needs identified providing you the right information we think might interest you.

As a matter of principle, we do not use fully automated decision-making processes. The final decision being taken through human intervention. In the event that we should use such processes, we will advise you in advance.

## How to ask for assistance from the competent authorities?

If you remain unsatisfied, then you have the right to apply directly to a Data Protection Supervisory Authority. Listed below are the country where Airbus operates and the relevant Supervisory Authority :

**FRANCE:**     [CNIL: Supervisory Authority France](#)

## Additional Notice for California Residents

In addition to the information provided above, The following section is made specifically pursuant to the California Consumer Privacy Act of 2018 (“CCPA”).

We don't sell your personal information to third parties and we will not sell your personal information to third parties unless provided otherwise by a specific privacy notice. We do not discriminate against California residents who exercise their CCPA privacy rights. To exercise your California privacy rights please refer to the section “*How to exercise your rights*”.

## Cookies Policy

Please refer to the cookies policy inserted in the [Airbus Flight Academy Europe.com privacy notice](#).

## Modification of the Privacy Notice

Airbus Flight Academy Europe 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.