

Employee Fair Processing Privacy Notice

A. What is this notice and why should you read it?

- a. This privacy notice explains how and why CAVS UK, including each of its operating entities FB Heliservices Ltd, FR Aviation Ltd, FR Aviation Services Ltd (also referred to as "**CAvS UK**", "**we**", "**our**" and "**us**") uses personal data about our employees, staff, contractors, trainees, apprentices, officers, consultants, and temporary or agency workers (referred to as "**employees**" or "**you**").
- b. You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.
- c. This notice does not form part of your contract of employment or any other contract to provide services.

B. CAvS UK's data protection responsibilities

- a. "**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.
- b. The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- c. CAvS UK is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data, and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- d. You also have responsibilities whenever you process personal data in connection with the performance of your role at CAvS UK; these are outlined in the internal **CAvS UK Data Protection Policy**, which can be found on the HR policies site within CAvS UK Connect Intranet.

C. What types of personal data do we collect and where do we get it from?

- a. We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will seek to make this clear, for instance we will explain if any employment forms you are required to complete are optional and can be left blank.
- b. Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- c. As set out in the table at **Schedule 1**, we collect your personal information from you directly when you apply for a job with us, when you complete our employee information forms, correspond

with us and in the course of performing your job. We also obtain some personal data from other people and organisations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of CAVS UK provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, and third-party benefits providers.

- d. Due to the type of business undertaken by CAVS UK, we also conduct background checks on our Employees, depending on the role undertaken. These checks can relate to any criminal convictions that you may have and include those checks that are required by applicable law and those required for our own policy compliance. Please see also the section below in relation to 'Sensitive Information'.
- e. If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting your local HR representative.

D. What do we do with your personal data and why?

- a. We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.
- b. We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.
- c. Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:
 - i. necessary for us to comply with a legal obligation; or
 - ii. necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it.

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

- d. We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

E. Sensitive Information

- a. Some of the processing described in the table at **Schedule 2** will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**"). This refers to sensitive or special categories of personal data for which applicable laws require us to process with more care.

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- b. The table at **Schedule 3** sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

F. Who do we share your personal data with, and why?

- a. Sometimes we need to disclose your personal data to other people.

Inside CAVS UK:

- b. CAVS UK includes a number of companies and operations globally. Therefore, we may need to share your personal data with other companies in CAVS UK for our general business and workforce management purposes and, in some cases, to meet our customer needs where working across offices/locations, for line management, authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis. For example, your business contact details will be available to colleagues throughout CAVS UK.
- c. Access rights between members of the CAVS UK are limited and granted only on a need to know basis, depending on job functions and roles.
- d. Where any CAVS UK companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected.

Outside CAVS UK:

- e. From time to time we may ask third parties to carry out certain business functions for us, for example the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.
- f. In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is in relation to:
 - i. services provided to you or us by a third party acting independently to CAVS UK, but which has a relationship with CAVS UK, for example an insurance provider or pension administrator;
 - ii. the purchase or sale of our business (or part of it) in connection with a share or asset sale, as part of which we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and/or

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- iii. the disclosure of your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.
- g. We have set out below a list of the categories of recipients with whom we are likely to share your personal data:
- i. employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);
 - ii. customers or clients of CAVS UK (for example, when tendering for work);
 - iii. consultants and professional advisors including legal advisors and accountants;
 - iv. courts, court-appointed persons/entities, receivers and liquidators;
 - v. business partners and joint ventures;
 - vi. trade associations and professional bodies;
 - vii. insurers; and
 - viii. governmental departments, statutory and regulatory bodies including (in the UK) the Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

G. Where in the world is your personal data transferred to?

- a. As part of a global organisation, CAVS UK may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.
- b. If any disclosures of personal data referred to above require your personal data to be transferred from within to outside the European Economic Area, we will only make that transfer if:
 - i. the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
 - ii. we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
 - iii. the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
 - iv. you explicitly consent to the transfer.

H. How do we keep your personal data secure?

- a. We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

I. How long do we keep your personal data for?

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- a. We will typically keep your personal data during the period of your employment or engagement with us and then, after your employment or engagement with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others, depending on a number of factors, including:
 - i. any laws or regulations that we are required to follow;
 - ii. whether we are in a legal or other type of dispute with each other or any third party;
 - iii. the type of information that we hold about you; and
 - iv. whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
 - b. Any personal data contained in any work-related correspondence or records may be retained for a different period than your other personal data, dependant on the retention period of the file that your personal data is held on.
 - c. For more information on our data retention practices, please see the CAVS UK Data Retention Policy, which can be found on the policies site within the CAVS UK Connect Intranet.

J. What are your rights in relation to your personal data and how can you exercise them?

- a. You have certain rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.
- b. Where our processing of your personal data is based on your **consent** (please see **Schedules 2 and 3**), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.
- c. Where our processing of your personal data is necessary for our **legitimate interests** (please see **Schedule 2**), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.
- d. If you wish to exercise any of these rights please contact your local HR representative, in the first instance.
- e. You also have the right to lodge a complaint with the relevant Supervisory Authority (which is the Information Commissioner's Office in the UK, for example).

K. Updates to this notice

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- a. We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice.

Employee Fair Processing Privacy Notice

SCHEDULES

SCHEDULE 1 **CATEGORIES OF PERSONAL DATA**

Type of personal data	Collected from
1. Contact Information <ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) 	You
2. Personal Information <ul style="list-style-type: none"> • Contact information (see above), as relevant • Date of birth • Gender • Next of kin or other dependants • Marital or relationship status • Lifestyle and social circumstances • Emergency contact information 	You
3. Identity and Background Information	

Type of personal data**Collected from**

- Contact information (see above), as relevant
 - Details of education and qualifications and results
 - Career history, experience and skills
 - Passport information
 - Driving licence information
 - Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)
 - Curriculum Vitae (CV) or resume
 - Educational certificates or other qualification evidence
 - Image or photographs
 - Application form
 - Evaluative notes and decisions from job interviews
 - Preferences relating to job location and salary
 - Conflicts of interests (including where related to family networks)
 - Background checks relating to criminal records (see also Sensitive Information) and credit score
- You, Recruitment consultants and agencies
 - Your previous employers
 - Publicly available information from online resources

4. Financial Information

- Contact information (see above), as relevant
 - Bank account details
 - Salary, compensation and other remuneration information
 - National insurance number and/or other governmental identification numbers
 - Tax codes
 - Business expense and reimbursement details
- You
 - Your previous employer

5. Sensitive Information

Type of personal data**Collected from**

- Racial or ethnic origin (including your nationality and visa information)
 - Biometric data (including fingerprints)
 - Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long-term absence)
 - Health and safety and accident records and report
 - Information relating to actual or suspected criminal convictions and offences
- You
 - Your emergency contact(s)
 - Your use of CAvS UK security control systems

6. Employment Administration Information

- Contact information (see above), as relevant
 - Terms and conditions of employment
 - Work related contact details (including location and office and corporate phone numbers)
 - Image / photographs
 - Holiday and other leave related records
 - Your working preferences and feedback in relation to CAvS UK and our staff
 - Your preferences in relation to our use of your personal data
 - Hours worked and working time preferences
 - Statutory and non-statutory leave and absence records
 - Job termination details
- You

7. Job Performance Information

- Contact information (see above), as relevant
 - Role responsibilities
 - Personal development reviews and appraisals, and associated feedback
- You
 - Your line manager(s) and co-workers

Type of personal data	Collected from
<ul style="list-style-type: none"> • Training records • Attendance information, including clocking in/out systems or timesheets • Promotion application and/or outcome records • Transfer and secondment information • Psychometric test results 	<ul style="list-style-type: none"> • Training providers • Company to which transferred or seconded
8. Investigation, Grievance and Disciplinary	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • CAvS UK investigations records • Grievance and disciplinary records • Employment tribunal records 	<ul style="list-style-type: none"> • You • Your line manager(s) and co-workers • Third parties, as permitted by applicable law
9. Travel and Expenses Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Transaction records • Visa, passport and insurance details • Flight and accommodation booking information • Travel itinerary information 	<ul style="list-style-type: none"> • You • Your use of CAvS UK payment cards (where relevant)
10. Benefits Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries 	<ul style="list-style-type: none"> • You • Third party benefits providers

Type of personal data	Collected from
<ul style="list-style-type: none"> Death benefit information 	<ul style="list-style-type: none"> Your dependants or other beneficiaries
11. Asset, Systems and Platform Usage and Communications Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Computer and phone records Access logs and usage records from document management systems and other CAvS UK provided applications and technologies User IDs and password information IP addresses and device identifiers Relevant records of calls, messages and/or internet or other data traffic and communications 	<ul style="list-style-type: none"> You Your use of CAvS UK assets, systems and platforms
12. Security, Location and Access Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Information (including images captured or recorded by electronic card access systems, CCTV and other security control systems) 	<ul style="list-style-type: none"> You Your use of CAvS UK security control systems

SCHEDULE 2

PROCESSING ACTIVITIES AND LAWFUL BASIS

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
a) Recruitment and workforce planning						
1. Developing, operating and collecting feedback on recruitment activities and employee selection processes	<ul style="list-style-type: none"> Personal Information Identity and Background Information Job Performance Information 				✓	
2. Administering your application for a job with us and considering your suitability for the relevant role	<ul style="list-style-type: none"> Personal Information Identity and Background Information Job Performance Information 				✓	
3. Obtaining, considering and verifying your employment references and employment history	<ul style="list-style-type: none"> Identity and Background Information Job Performance Information 				✓	
4. Reviewing and confirming your right to work	<ul style="list-style-type: none"> Identity and Background Information 			✓		
5. Conducting verification and vetting, including criminal background checks and credit checks where required by law (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Sensitive Information 			✓		
6. Conducting background checks, verification and vetting which are not required by law	<ul style="list-style-type: none"> Identity and Background Information Sensitive Information 	✓ (where such checks involve the processing)			✓	

Purposes of processing	Categories of personal data	Lawful basis				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
but needed by us to assess your suitability for your role (Note: please also see Schedule 3)		of Sensitive Information your consent may be required – please see Schedule 3)				
7. Making a job offer to you and entering into a contract of employment with you	<ul style="list-style-type: none"> • Personal Information • Financial Information • Employment Administration Information • Benefits Information 		✓			
8. Identifying and assessing CAVS UK’s strategic business direction and resourcing needs, current employees and areas for development	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
9. Promotion and succession planning	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
10. Analysing recruitment and retention objectives, processes and employee turnover rates	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
b) General employment management and administration						
11. Communicating with you and providing you with information in connection with your employment or engagement with us from time to time	<ul style="list-style-type: none"> • Personal Information 		✓		✓	✓

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
12 Paying your salary, compensation and any other benefits pursuant to your contract of employment	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 		✓			
13 Calculating and administering taxation within payroll, and your entitlements to any statutory / contractual benefits (including statutory sick pay and workforce pension arrangements)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 			✓		
14 Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information Sensitive Information 			✓	✓	
15 General staff administration, including workforce management and facilities operations	<ul style="list-style-type: none"> Employment Administration Information Asset, Systems and Platform Usage and Communications Information 				✓	
16 Managing our health and safety compliance obligations (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Employment Administration Information Sensitive Information 			✓		
17 Managing annual leave entitlement and records, and to administer related payments	<ul style="list-style-type: none"> Financial Information 				✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
	<ul style="list-style-type: none"> • Employment Administration Information 					
18 Managing absence records, contractual sick leave entitlement and administering related payments (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Sensitive Information 		✓		✓	
19 Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Sensitive Information 			✓		
20 Contacting the appropriate person in the event of an emergency concerning you (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 					✓
21 Administering our insurance policies (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information • Sensitive Information 				✓	
22 Determining whether any adjustments are necessary to enable you to carry out your role (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 		✓	✓		
23 Preparing risk assessments to prevent future injuries in the workplace (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information • Sensitive Information 			✓		

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
24 Carrying out performance reviews	<ul style="list-style-type: none"> Job Performance Information 				✓	
25 Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information Asset, Systems and Platform Usage and Communications Information 				✓	
26 Administering, recording and analysing training and training records	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information Asset, Systems and Platform Usage and Communications Information 				✓	
27 Supporting the establishment and maintenance of staff directories	<ul style="list-style-type: none"> Employment Administration Information 				✓	
28 Considering your continuous suitability for your role	<ul style="list-style-type: none"> Job Performance Information 				✓	
29 Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	<ul style="list-style-type: none"> Financial Information Employment Administration Information 	✓				

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
	<ul style="list-style-type: none"> Job Performance Information Benefits Information 					
30 Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes	<ul style="list-style-type: none"> Investigation, Grievance and Disciplinary 				✓	
31 Responding to reference requests from your future potential employers	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information Investigation, Grievance and Disciplinary 				✓	
c) Security and governance						
32 Monitoring the security of CAvS UK's physical premises and systems, networks and applications	<ul style="list-style-type: none"> Security, Location and Access Information 			✓	✓	
33 Identifying and authenticating employees and other individuals (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Security, Location and Access Information Sensitive Information 				✓	
34 Establishing a network of emergency contacts for individuals in case of emergency	<ul style="list-style-type: none"> Personal Information Security, Location and Access Information 				✓	
35 Identifying, investigating and mitigating suspected misuse of CAvS UK's assets, systems and platforms (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Asset, Systems and Platform Usage and Communications Information 			✓	✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
	<ul style="list-style-type: none"> Security, Location and Access Information Sensitive Information 					
36 Ensuring compliance with CAvS UK policies and procedures (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Employment Administration Information Investigation, Grievance and Disciplinary Travel and Expenses Information Asset, Systems and Platform Usage and Communications Information Security, Location and Access Information Sensitive Information 				✓	
d) Legal and regulatory compliance and responsibilities						
37 Managing and administering our equal opportunities reporting (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Sensitive Information 					
38 Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	Potentially all categories of personal data				✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
(Note: please also see Schedule 3)						
39 Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data				✓	
40 Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
41 Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting CAvS UK's compliance with relevant legal and regulatory requirements (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
42 Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting CAvS UK's compliance with best practice and good governance responsibilities (Note: please also see Schedule 3)	Potentially all categories of personal data				✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
43 Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Employment Administration Information Investigation, Grievance and Disciplinary Security, Location and Access Information Sensitive Information 			✓	✓	
e) Day-to-day business operations						
44 Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable	<ul style="list-style-type: none"> Employment Administration Information Investigation, Grievance and Disciplinary Asset, Systems and Platform Usage and Communications Information Security, Location and Access Information 				✓	
45 Managing, planning and delivering our global business, sales and marketing strategies	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information 				✓	
46 Supporting our diversity programmes and staff support networks and initiatives (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Personal Information Sensitive Information 	✓ (where this involves the processing of Sensitive		✓ (where such a legal obligation applies)	✓	

Purposes of processing	Categories of personal data	Lawful basis				
		You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
		Information, your consent may be required – please see Schedule 3)				
47 Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of CAvS UK projects and initiatives in our marketing materials, social media posts and press releases	<ul style="list-style-type: none"> Contact Information Employment Administration Information 				✓	
48 Administering your travel and accommodation arrangements	<ul style="list-style-type: none"> Travel and Expenses Information 		✓	✓	✓	
49 Supporting and maintaining our technology infrastructure	<ul style="list-style-type: none"> Asset, Systems and Platform Usage and Communications Information Security, Location and Access Information 		✓		✓	
50 Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business (Note: please also see Schedule 3)	Potentially all categories of information			✓	✓	

SCHEDULE 3
SENSITIVE INFORMATION – PROCESSING ACTIVITIES AND LAWFUL BASIS

Purposes of processing	Special category lawful basis					
	We are permitted to process your personal data because...					
	You have given your explicit consent to the processing	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
a) Recruitment and workforce planning						
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓ (where such checks relate to matters of national security and defence)	
2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	

Special category lawful basis

We are permitted to process your personal data because...

Purposes of processing	Special category lawful basis					
	You have given your explicit consent to the processing	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
b) General employment management and administration						
3. Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4. Managing our health & safety compliance obligations		✓			✓	
5. Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	
6. Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay		✓			✓	
7. Contacting the appropriate person in the event of an emergency concerning you			✓			
8. Administering our insurance policies					✓	
9. Determining whether any adjustments are necessary to enable you to carry out your role		✓			✓	
10. Preparing risk assessments to prevent future injuries in the workplace		✓			✓	
c) Security and governance						
11. Identifying and authenticating employees and other individuals	✓			✓ (where such processing is necessary to detect or	✓ (where such processing is required as a matter	

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12. Identifying, investigating and mitigating suspected misuse of CAVS UK's assets, systems and platforms				prevent an unlawful act)	✓	
d) Legal and regulatory compliance and responsibilities						
13. Managing and administering our equal opportunities reporting					✓	
14. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities				✓		
15. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same.	✓				✓	(where such processing is necessary to detect or prevent an unlawful act)
16. Complying with disclosure orders arising in civil proceedings				✓		
17. Investigating, evaluating, demonstrating, monitoring, improving and reporting on CAVS UK's compliance with relevant legal and regulatory requirements				✓		

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18. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting CAVS UK's compliance with best practice and good governance responsibilities	✓			✓	✓ (where such processing is necessary to detect or prevent an unlawful act or to comply with law or a regulatory code of conduct)	
19. Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes				✓		
e) Day-to-day business operations						
20. Supporting our diversity programmes and staff support networks and initiatives	✓					
21. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business	✓		✓ (to the extent necessary to ensure that your rights with a new employer can be complied with)			

SCHEDULE 4
YOUR RIGHTS IN RELATION TO PERSONAL DATA

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a " <i>data subject access request</i> ").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.

Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

DOCUMENT CONTROL

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DOCUMENT OWNER:	Sophie Lowton

VERSION HISTORY

Version Number	Key changes	Effective Date
V3	Drafted by Eversheds and sent to CAvS UK for review and feedback.	17-Apr-18
V4	CAvS UK feedback incorporated by ES and sent back to CAvS UK	30-Apr-18
V5	Joint review with Mark Thomas and Rachel Cass, changes made by Mona Bashir (accepted changes proposed in v4, removed comments, removed front page (Policy template used by ES) and general formatting)	03-May-18
V6	Removed purpose of FPN (internal instruction), removed 'breaches' of this notice paragraph. General formatting.	04-May-18
V7	Final review and comments from Rachel Cass. Included 'privacy' into FPN title. General formatting	10-May-18
V8	Changes made to Schedule 2 and 3 (additional lawful basis selected other than consent. (Signed off by RC 16-May-18)	15-May-18

V9	Changes made to refer to CAvS UK only, removing associations with Cobham PLC. General formatting.	07-May-2020
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