

# AIRBUS

## PRIVACY INFORMATION NOTICE related to Click n'Buy programme

### Introduction

Airbus SAS and its affiliates (also known as, "Airbus", or "we" or "us") appreciate your interest in Click and Buy applications.

Your privacy is important to us and we want you to feel comfortable using it.

Airbus 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 our processes.

The protection of your privacy and Personal Data is an important concern to which we pay special attention throughout our business processes. Personal Data collected during use of Click'n Buy is processed by all the actors according to the legal regulations valid for the countries in which the website is maintained.

The CnB application is based on a Component on the shelf operated as software as service (COTS SaaS) provided by the Business Spend Management Software provider "COUPA Software Inc.", and hosted on a Virtual Private Cloud (Amazon Web Service, in Germany) i.e. out of Airbus premises. For SaaS customers, COUPA Software Inc. has set in place dedicated [Coupa Privacy policy](#) for their "Controller" or "Processor" activity. Airbus is as well performing such roles for the maintenance of the integration with Airbus IT landscape (e.g. SAP), monitoring of the overall processes and the support of the end users.

This privacy notice's purpose is to let you know how Airbus and more specifically CnB team looks after the personal data related to you (for the SaaS part, we encourage you to carefully read the [Coupa Privacy policy](#) available on the COUPA portal). This notice also tells you about your privacy rights and how the law protects you.

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

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 process under this Privacy Notice are as follows:

- Identification data: Airbus employee personal data (name, alias/mention name, employee ID number, photo),
- Professional data : email, phone number, mobile phone number, business contact email address, employee group, department ID, immediate Supervisor, Supervisor ID, Siglum, delegates.
- Economic & Financial data : approval limits, self-approval limits.
- Location data: work location (Building room, city, postal code, Country/regions, Airbus location code)
- Account information: login/password (when SSO not used), role and permissions, settings and preferences (preferred language, currency, Chart of account, notifications).
- IT data /Digital activity data: logs/history, time stamps.
- Application information: browser cache, uploaded content.

Thank you to note that this list, given only for information purposes, is not exhaustive and may differ since the last update of this document, thank you to contact the CnB project in case of question related.

We may collect this Personal Data cumulatively:

- **directly** from your use of the CnB applications by navigating to our Website or by filling your setting,
- **Indirectly** for those Personal Data that you have made available to Airbus and is stored in the corporate directory (names, email address, phone number, work address, department, employer...).

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

By using the CnB applications, Airbus will collect and process your Personal Data for the following purposes (hereinafter referred as: the 'Purposes'):

- IT services : Digitalize the Sourcing to Pay processes, Manage Electronic Communication Interfaces (e.g. EDI, API, etc.) with other tools within the Airbus IT landscape (e.g. SAP, ADAM,...),
- Record management: maintain transaction record accordingly to Airbus processes,
- Company Policy Compliance and Legal/Regulatory Compliance : support to Internal and external Audits,
- Fraud/Loss Prevention and Detection : Implement a Fraud/Loss Prevention System/Workflow,

- Outsourcing and suppliers management: Supply Chain Management, Manage Supplier Performance/Quality , Assess Conflicts of Interest (CnS),
- Monitoring Customer Support : Identify Reputational and Operational Risks,
- Promote Products/Services : Publish Newsletters and operate Measure and performance,
- Customer/User Satisfaction : Provide User Control Over Their Personal Data and Communication Preferences,
- Research and development : allowing to improve our product and its performance via troubleshooting and statistical analysis,
- 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,

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 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 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:

**To comply with contractual obligations.**

For Airbus employee(s), we process your Personal Data as part of the performance of employment Contract to which you are party in order to complete our respective contractual obligations.

When you subscribe to a particular service through the Website, the purposes of processing your Personal Data are primarily determined by that service and we will process your information so that we can provide that service to you.

**On the basis of Airbus' legal obligations**

Airbus, as any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for Airbus in order to fulfil these obligations.

## 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:

- Airbus and its affiliates,
- Authorised persons working for or on behalf of Airbus, including our agents, service providers and advisers providing the variety of products and services we need such as:
  - **Service provider of the SaaS solution** (COUPA) and its subcontractors, See [Coupa Privacy policy](#) for more detail.
  - **Integrators** : Accenture, mainly located in Europe & UK and Philippines offices,
  - **IT and functional support** (Inetum, AKKA Technology, Accenture, CGI, SOPRA STERIA I2S, Infotel Conseil, WNS Global services (subcontracted by GP), ComputaCenter, DSI,...), mainly located in Europe & UK,
  - **Consulting**: COUPA, mainly located in Europe.
- Airbus business partners in connection with Airbus activities (e.g. Educational Institutions for recruitment, law/consultancy firms...);
- Other authorised third parties in connection with any merger, reorganization, a sale of some or all Airbus assets, or a financing or acquisition of all or a portion of our business by another company.
- Law enforcement or government authorities or other legal process 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 transfer your Personal Data to?

Airbus processes 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 in Philippine for integrator activity only.

This transfer is subject to appropriate safeguards, within Airbus 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 providing web-services to you.

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

*France, Germany, Ireland, Philippines, Poland, Spain, United Kingdom, United States of America.*

## How long will your Personal Data be stored?

Your personal data records are kept during all the application lifetime and or as long as it is required to meet our contractual and statutory obligations.

We will only use your personal information for the purposes for which we collected it, 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 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 information for an unrelated purpose, we will notify you prior this further data processing and will provide you the relevant information notice.

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 unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

## 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:

- **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.
- **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.

## How to exercise your rights and/or contact Airbus 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 Data Protection Officer, who is available, at the following email address:

[dataprotection@airbus.com](mailto:dataprotection@airbus.com) or you can write to the address below:

Airbus SAS, Head of Data Protection, 2 rond-point Emile Dewoitine 31700 Blagnac cedex. 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 are necessary to enter into a contract or to comply with legal obligation, any failure to provide the requested Personal Data may conduct us not being able to fulfil our contractual/legal obligations or to achieve the expected results.

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

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

## How to ask for assistance to 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 four main European countries where Airbus operates and the relevant Supervisory Authority

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

**GERMANY:** [Each German federal state has its own Data Protection Authority that can be found under the following link:   
https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html \(see tab „Aufsichtsbehörden für den nicht-öffentlichen Bereich“, i.e. Data Protection Authorities for the private sector\)](#)

**SPAIN:** [AGPD.Supervisory Authority Spain](#)

**UK:** [ICO: Supervisory Authority UK](#)

## Cookies Policy

### WHAT ARE COOKIES?

Cookies are small files or amount of information that may be stored to, accessed and remove from your device when you access CnB.

For instance, a “Cookie” may refer to “http cookie”, flash cookie” (used by some applications or website relying on *Flash* technology), local storage area of your internet browser, unique identifier calculated from your internet browser characteristics (also known as “browser fingerprinting”), or unique identifiers related to your device or your internet browser (device serial number, MAC address, Android ID, advertising ID, etc...)].

Cookies allows us to recognize your device and store information about your preferences or past actions. We may use Cookies:

- (i) to record the preferences of our users,

- (ii) to enable us to optimize the design of CnB,
- (iii) to ease navigation, and increase the user-friendliness of CnB,
- (iv) to analyze the usage CnB, and/or to identify the most popular sections of CnB,
- (v) to provide content that is more accurately suited to your needs, and, in doing so, improve CnB. Cookies can be used to determine whether there has been any contact between us and your device in the past,
- (vi) to facilitate secure online access so that you do not need to enter your user ID and password again when you access CnB,

### **WHICH COOKIES DO WE USE?**

Cookies contain Personal Data. Airbus doesn't manage cookies in its part of "Controller" or "Processor" activity. [COUPA cookie policy](#) is available to learn more about the purposes for which the Business Spend Management Software provider "COUPA Software Inc." collects information through cookies and your rights under applicable data protection laws.

### **HOW CAN YOU DISABLE OR DELETE COOKIES?**

When the Cookies we use are strictly necessary for technical reasons, they are marked as "mandatory" on the table above. Those Cookies does not require consent from you. However, if you choose not to accept Cookies that are strictly necessary for the provision of our services provided by our Website, it may result in a reduced availability of such services.

For the Cookies that requires a consent from you, please be informed that you can revoke this consent at any time. You can also manage and control the cookies we use, and delete them directly on CnB through the cookies settings interface.

You can prevent Cookies from being stored on your device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can also delete Cookies already on your device at any time through your browser's settings.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Modification of the Privacy Notice**

Airbus 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.