



PRIVACY INFORMATION NOTICE FOR AIRBUS CHINA DIGITAL PLATFORM

Introduction

AIRBUS (CHINA) ENTERPRISE MANAGEMENT AND SERVICE CO., LTD. (“we” or “us”) appreciate your interest in our products, services and business lines and your use of our digital platform Airbus China Digital Platform (“Platform”).

Platform features a layer of data analytics and visualisation tools that allow for the exploration and analysis of certain data, information and material, including correlation between the elements of various data sets. Via Platform, AIRBUS (CHINA) ENTERPRISE MANAGEMENT AND SERVICE CO., LTD. provides online IT services, both standard and bespoke, to players in the aviation ecosystem, such as airlines, airline manufacturers, operators, lessors, MRO as well as system and component suppliers (together: the “Customers”), to provide them with information they may take into account for optimised decision-making with regard to, inter alia, maintenance, design, engineering, safety and upgrade of aircraft, flight operations and respective cost reductions, fleet planning, cabin and commercial operations as well as support activities. Access to Platform is only granted to designated personnel of Customers (“Users”) and to AIRBUS (CHINA) ENTERPRISE MANAGEMENT AND SERVICE CO., LTD.’ employees and its own affiliates, subcontractors, business partners.

In connection with the operation of Platform, information originating from various sources, such as information from aircraft and information related to aircraft operations, its configuration and maintenance, are collected and processed by AIRBUS (CHINA) ENTERPRISE MANAGEMENT AND SERVICE CO., LTD., affiliates, subcontractors (together “ACEMS”) as well as Customers and other parties to the extent permitted by law and under the conditions agreed with ACEMS.

Specific support platform for Users (“Platform Support Portal”) is made available to any Users that enables you to create a ticket to get support on Platform products, follow up or escalate on opened tickets and consult the Platform knowledge database.

ACEMS is committed to protecting the privacy of individuals and to complying with applicable Personal Data protection laws and regulations. We want you to feel comfortable accessing and using Platform services. However, to the extent applicable, Platform might include specific applications which are not necessarily covered by this Privacy Notice. In this event, we encourage you to carefully read the privacy policies applicable to such applications.

This Privacy Notice will inform you of the Personal Data we handle as data handler when you access/use Platform; 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.

ACEMS will process your Personal Data in accordance with *Personal Information Protection Law of the People's Republic of China (“PIPL”)* and any other applicable privacy related Chinese laws. ACEMS is fully aware of the importance of Personal Data to you, and will take corresponding security measures to protect the safety and reliability of your Personal Data.

What is Personal Data?

Personal Data refers to all kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the information handled anonymously. It includes information such as name, date of birth, identity document number, personal biometric information, address, communication contact, communication record and content, account password, property information, credit information, whereabouts, accommodation information, health and physiological information, transaction information, etc.

Which sources and what Personal Data do we use?

The Personal Data we process in relation to Platform services are as follows:

- **directly** from you by accessing to and using Platform or that you include in your Platform Support Portal profile:
 - Identification data: Name, Family Name, Nickname, professional email address, profile picture (optional),
 - Professional data: Job Title (optional), Department (optional), location (optional), Organisation, professional phone number (optional), tickets support number opened to support team, emails content and comments you shared with dataprivacy.china@airbus.com, timezone (optional).
 - Account information: roles and permissions, settings and preferences, user name login, password, unique user nickname
 - IT data/ Digital activity: IP Address, MAC address, Unique ID, Application information, Application session data and logs (including access and activities)
- **indirectly** for those Personal Data that we collect from other databases or data sources we have in ACEMS, such as OneLogin, AirbusWorld profile or data provided to ACEMS by your local administrator (UMC & UMS):
 - Identification data (first name, last name)

Sensitive Personal Data

We may collect and process your Personal Data that fall in the scope of “sensitive personal information” under the PIPL. Specifically, “sensitive personal information” refers to Personal Data that, once leaked or illegally used, is likely to cause infringement of the natural persons' human dignity or harm to the personal and property safety, including biometric identification, religious belief, specific identity, medical health, financial account, track and other information, as well as Personal Data of minors under the age of 14.

In any case of processing the above sensitive Personal Data, ACEMS will only collect and process it with your separate consent in written or in other circumstances specified by laws and regulations. ACEMS may only process your sensitive Personal Data for specific purposes as described in the Privacy Information Notice for Airbus China Digital Platform, as necessary, and subject to strict security measures. ACEMS’s processing shall be conducted in a manner having the least impact on your personal rights and interests.

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

By accessing and using Platform and Platform Support Portal, ACEMS will process your Personal Data for the following purposes:

- To provide access to Platform products and services (including access to Platform Support Portal, provide support service through ticketing solution, analyze the optimisation of our Platform products and services and/or improve our Platform products and services)

We will process your Personal Data to give you access to the Platform and Platform Support Portal, its data and its application and deliver associated services. It includes user authentication when you access both platforms (Platform and Platform Support Portal). In particular we use your Personal Data to let you create support requests (tickets), assist you and follow their resolution. Within this frame we may also use your Personal Data to communicate with you for the incident's resolution.

- To manage operational workflow and decision making
- To protect Information, Systems, Network and Cybersecurity. Platform contains a restricted area of which access protection relies on your Personal Data, for detection of security threats, frauds or other malicious or criminal activities and the IT operation of ACEMS.
- To communicate with you as Users
- We use your Personal Data to communicate with you or amongst Users, including responding to requests for assistance, participation to Platform forum,

- To effectively communicate with you in a variety of ways, including email and to keep you up-to-date on the latest information about our services, solution and/or business activities, participation in Platform forum, events, marketing campaigns, market analysis or other promotional activities and for analysis and improving the quality of our services and communication with you.
- To comply with legal obligations.
We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request or to comply with export control and sanctions requirements when applicable.
- To protect us and others
Where we believe it is necessary to investigate, monitor compliance with our policies and standards. 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 Data for the above purposes only. If we need to use your Personal Data for an unrelated purpose, we will obtain your consent including separate consent or written consent as required by applicable laws by providing you.

What is the basis for the processing of your Personal Data?

- ACEMS will process your Personal Data in accordance with the principles of legality, legitimacy, necessity, and good faith.

ACEMS will ensure and maintain the legally valid basis regarding the processing of Personal Data under the PIPL before processing your Personal Data. Where legally required (and where no other legal basis for processing exists), we will obtain your consent before processing your Personal Data.

- ACEMS may process your Personal Data without your consent, under any of the following circumstances:
 - where it is necessary for the conclusion or performance of a contract to which you are a party, or for the implementation of human resources management in accordance with the labor rules and regulations formulated in accordance with the law and the collective contract concluded in accordance with the law;
 - where it is necessary for the performance of statutory duties or obligations;
 - where it is necessary for the response to a public health emergency or for the protection of life, health and property safety of a natural person;
 - where such acts as news reporting and supervision by public opinions are carried out for public interest, and such processing of Personal Data is within a reasonable scope;
 - where it is necessary to process the Personal Data disclosed by you or other Personal Data that has been legally disclosed within a reasonable scope in accordance with the PIPL; and
 - other circumstances prescribed by laws and administrative regulations.
- Subject to the applicable law, we may process your Personal Data under the following basis:
 - For Users, ACEMS subcontractors and business partners, we will require ACEMS Customers, subcontractors and business partners to promise and confirm that, when you have been designated access to Platform by your company, it has obtained your consents or established other forms of legally valid basis on processing your Personal Data.
 - As an employee of ACEMS and affiliates, when you access and use Platform, we process your Personal Data for the global united human resources management as necessary in accordance with the labor rules and regulations formulated according to applicable laws and the employment contract to which you are a party.
 - In addition, ACEMS, as any other company, is subject to legal obligations and regulations. On the basis of ACEMS' legal obligations or in the public interest, in some cases the processing of your Personal Data will be necessary for ACEMS in order to fulfil these obligations.

Who will receive your Personal Data?

We will not share your Personal Data unless we obtain your separate consent or in circumstances where your consent is not required according to relevant laws and regulations in China. We will provide you with the name and contact information of specific Personal Data processors (as defined under the PIPL), purposes and methods of processing, and types of Personal Data related to you, before your Personal Data is shared as required by the PIPL.

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:

- ACEMS and its Affiliates;
- Authorised persons working for or on behalf of ACEMS;
including our agents, service providers and advisers (e.g. Third party service providers and advisers providing the variety of products and services we need such as IT tool, hosting, maintenance and support, procurement services, compliance and security services, etc.);
- Any Users accessing to Platform Support Portal (limited to Nickname and profile picture if uploaded);
- Your company you are working for;
- Other authorised third parties in connection with any merger, reorganisation, a sale of some or all ACEMS 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 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.

Is any of your Personal Data transferred overseas?

ACEMS processes your Personal Data mostly in China. On occasion, ACEMS as a global company, may provide your Personal Data to relevant recipients as described in Section “Who will receive your Personal Data?”, as necessary, including entities located in third countries, in order to achieve global management of Airbus, to conduct jointly managed activities, and for internal business analysis and planning.

Any transfers of your Personal Data within the Airbus group (more information re the worldwide locations of Airbus group can be found on www.airbus.com/en/about-us/our-worldwide-presence) for ACEMS daily business activity and internal organization are covered by an intra-group agreement (Binding Corporate Rules) that can be found on our portal www.airbus.com. Airbus Binding Corporate Rules includes contractual protections to ensure that your Personal Data receives an adequate level of protection wherever it is transferred within ACEMS. We will comply with the applicable obligations and requirements under the PIPL in relation to sharing and cross-border transfers of your Personal Data.

In addition, we may share some Personal Data to third parties as authorised recipient and engaged to help us notably for providing Platform Support services to you and located outside China. Transfers to service providers will be protected by contractual commitments (such as the Cyberspace Administration of China-approved Standard Contractual Clauses) or other legally acceptable mechanisms under relevant laws and regulations in China.

If you have any questions regarding data transfers, please contact us (dataprivacy.china@airbus.com) for further details.

How long will your Personal Data be retained?

We retain your Personal Data as long as reasonably necessary for the purposes for which it was collected:

- For Platform account management: twelve (12) months from the date of the last interaction with you or twelve (12) months after your company is notifying us about the request for account deactivation.
- For Ticket Platform Support portal: up to three (3) years after your last interaction with the Support team.

- For Forum post: up to three (3) years without activity on the related post.

In some circumstances, we may retain your Personal Data for a longer period of time than is needed for those purposes such as where we are required to do so in accordance with legal, regulatory, tax or accounting legal requirements. The retention conditions of your Personal Data is determined by applicable Laws and Regulation and/or by our procedures or processes adopted in accordance with applicable Laws and Regulation.

If your Personal Data is no longer required for the performance of the related purposes as described in Section “*What are the purposes of the processing of your Personal Data?*”, these will be erased on a regular basis unless further processing is necessary, for instance, for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation.

Security

We use technical and organisational security measures in order to protect the 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?

At any time you may exercise your Personal Data protection rights as listed below by contacting us at dataprivacy.china@airbus.com:

- **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 ACEMS and if so, what specific data is being processed.
- **Right to correct Personal Data:** You have the right to change 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:** Under some circumstances provided by law, 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.
- **Right to object:** In some cases required by law, you may ask us to stop processing your Personal Data.
- **Right to know and make decisions:** You have the right to know and decide on the processing of your Personal Data.
- **Right to copy:** You can request a copy of your Personal Data.
- **Right to erasure:** In addition to the rights provided in Section “*What are your rights?*” of the Privacy Information Notice for Airbus China Digital Platform, you may also request us to erase your Personal Data under the following circumstances:
 - The processing purpose has been realized or cannot be realized;
 - The Personal Data storage period has expired;
 - We collect, use and process your Personal Data without your consent or do not meet other circumstances stipulated by laws and regulations, or you withdraw your consent;
 - Our processing of Personal Data is in violation of laws, administrative regulations or agreements;
 - Other circumstances stipulated by laws and administrative regulations.
- **Right to request explanation:** You are entitled to request us to explain our rules for processing your Personal Data. As mentioned in Section “*Do we use automated decision-making?*” of the Privacy Information Notice for Airbus China Digital Platform, as a matter of principle, we do not use fully automated decision-making processes such as profiling. If in the future we make automated-decisions about you, due notice will be provided, and we will offer you options that do not target your characteristics. You can reject the automated-decisions as well.
- **Right to withdraw:** 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 ACEMS 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?*”.

How to exercise your rights and/or contact ACEMS 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 ACEMS Data Protection Officer, who is available, at the following email address: dataprivacy.china@airbus.com or you can write to the address below: Room 4001-4041, Building No.2, Tianzhu Road No.8, Beijing Airport Economic Core Zone, Shunyi District, Beijing, 101312 PRC.

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?

For ACEMS employees and affiliates: Your access in Platform directly results from an employment agreement between you and ACEMS. Your Personal Data is therefore required to grant appropriate access right into Platform. Any failure to provide the requested Personal Data may result in failure to fulfil our contractual/legal obligations agreed with you and consequently you may not be able to access and use information, features or services of Platform (including opening support tickets on Platform products nor accessing to Platform Support Portal)

For Users, ACEMS subcontractors and business partners: Your access in Platform directly results from a commercial agreement signed between your company you worked with and ACEMS. Your Personal Data is therefore required to grant appropriate access right into Platform. Any failure to provide the requested Personal Data may result in failure to fulfil our contractual/legal obligations agreed with your company and consequently you may not be able to access and use information, features or services of Platform (including opening support tickets on Platform products nor accessing to Platform Support Portal)

Do we use automated decision-making, or conduct profiling?

As a matter of principle, we do not use fully automated decision-making processes, including profiling. In the event that we should use such processes, we will specifically inform you in advance of this and of your rights in this respect as required by law.

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, such as the Cyberspace Administration of China.

Cookies

What are cookies?

Cookies are small files or amounts of information that may be stored to, accessed, downloaded and removed from your device when you access and use Platform. Within the context of Platform, a “Cookie” refers to “http cookies”.

Cookies allow Platform to recognise your device and store information about your preferences or past actions. We may use cookies:

- to record the preferences of our Users, and/or to enable us to optimise the design of Platform
- to ease navigation, and increase the user-friendliness of Platform.
- to identify the most popular sections of Platform.
- to provide content that is more accurately suited to your needs, and, in doing so, improve our service. Cookies can be used to determine whether there has been any contact between us and your device in the past.
- cookies may be used to facilitate secure online access so that you do not need to enter your user ID and password again.

Personal details may be saved in cookies.

Which cookies do we use on Platform?

Please find below a table with specific information for each cookie that we may use on Platform:

Name of Cookie	Purpose	Duration	Cookie type	Mandatory
CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.LastAuthUser	Technical cooky used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.onelogin-airbus_<USER_EMAIL>.accessToken	Technical cooky used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.onelogin-airbus_<USER_EMAIL>.idToken	Technical cooky used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.onelogin-airbus_<USER_EMAIL>.refreshToken	Technical cooky used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical

CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.onelogin-airbus_<USER_EMAIL>.tokenScopesString	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
CognitoIdentityServiceProvider.40u00bq6mk6jh2ueatfn1gluqv.onelogin-airbus_<USER_EMAIL>.userData	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
amplify-signin-with-hostedUI	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	Session	HttpOnly	YES : technical
host-for-redirect	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	1000 secs	HttpOnly	YES : technical
spa-auth-edge-nonce	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	1000 secs	HttpOnly	YES : technical
spa-auth-edge-pkce	Technical cookie used for the WIPS pattern blueprint (Web Internet Publishing Serverless)	1000 secs	HttpOnly	YES : technical
ph_phc_guEReWIAetgGz9vEhegzH11aKUvb9woLLsd9lPNkrmL_posthog	For Posthog analytics	1 Year	Not HttpOnly	YES : technical

If you continue browsing Platform, we understand that you accept the use of cookies. You can revoke this consent at any time. You can also manage and control the cookies we use on Platform through the use of cookies tools.

How can you disable or delete cookies?

Most browsers automatically accept cookies. 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 delete cookies already on your device at any time. However, if you choose not to accept cookies that are strictly necessary for the provision of our services provided by Platform, it may result in a reduced availability of such services.

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 or www.allaboutcookies.org.

Modification of the Privacy Notice

ACEMS 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.