

Employee Privacy Notice



About this Employee Privacy Notice

Jet2 plc and its associated companies (which includes **Jet2holidays Limited** and **Jet2.com Limited**) (the "**Company**", "**we**", "**us**" and "**our**") hold and process data on all current and former Colleagues, workers, individual contractors, contingent workers, interns, agency workers, Consultants, Directors, job applicants and third parties whose information you provide to us in connection with the employment or work relationship (for example next-of-kin, emergency contact information and/or dependents) ("**Colleague**" or "**you**" or "**your**").

We are committed to only collecting, using and disclosing your personal data in ways that you expect and as we are required or allowed to by law. This notice describes the categories of personal data we collect, how your personal data is processed, for what purposes we process your personal data and how your privacy is safeguarded in the course of our relationship with you. This notice is intended to comply with our obligations to provide you with information about the Company's processing of your personal data under privacy laws. Please note that it does not form part of your contract of employment or engagement. Where we use the term employment in this Privacy Notice this also includes other engagements or work relationships.

This notice applies in conjunction with any other notices or communications which you receive from the Company in connection with the processing of your personal data.

If you have any questions about the processing of your personal data or your privacy rights or would like to access the information that this Privacy Notice contains in a different format, please contact your HR Business Partner or HR Advisor.

If you are aware of an unauthorised use or disclosure of data, please let us know immediately by contacting your HR Business Partner or HR Advisor or the Data Protection Officer at: privacy@jet2.com.

Who is the controller of your data?

The Company that employs you under your contract of employment or engages you under your contract for services will be the data controller of your personal data. In addition, where processing of personal data is undertaken by any other group company for their own independent purposes, that company may be a controller of your personal data. This Privacy Notice is provided on behalf of the Company that employs or engages you and each of its associated companies.

The Company's data controllers are as follows: **Jet2.com Limited**, **Jet2holidays Limited** and **Jet2 plc**. We have a Data Protection Officer ("DPO") who is responsible for compliance with data protection law. You may contact the DPO securely and confidentially at any time if you have any concerns about the processing of your personal data or any data protection issues. The DPOs contact details are: dataprotection@jet2.com.

The DPO is the same for each company.

What data do we process?

The Company may collect various types of personal data about you for the purposes described in this Privacy Notice.

This personal data includes:

- *Personal details:* your title, forename, middle name(s) and surname, previous names, preferred name, gender, nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone number, e-mail), previous address, national insurance number, immigration and eligibility to work data, languages spoken, next-of-kin/dependent contact information, details of any disability and any reasonable adjustments required;
- *Recruitment data:* information provided during your initial recruitment process and any subsequent role application (such as personal details, CV, application form (including information as to any criminal offence which may be provided on the application form), employment history, experience and qualifications), interview, selection and assessment data, video recordings of interviews, vetting and verification information and information obtained as a result of pre-screening (e.g. reference check, 5 year employment check for relevant roles and 2 year employment check for other roles, credit reference check in relation to roles in finance or fraud, basic disclosure criminal record checks relating to any unspent convictions, medical certificate for relevant roles, driving/pilot licence checks in relation to relevant roles), right to work verification, information related to the outcome of your application, details of any offer made to you;
- *Data related to your engagement with the Company:* contract of employment or engagement, work contact details (e.g. address, telephone number, e-mail), work location, your worker ID and various system IDs, your photograph, your start date, your job title and job description, your working hours and patterns, whether you are full or part time, details of any Company property you have been issued with, your termination date, the reason for termination, exit interview data, references, job title, any change in job, date of change;
- *Remuneration and benefits data:* information about your pay (including salary/hourly/contract pay, allowances, overtime, bonus and incentives), payment for leave/absence (e.g. holiday pay, sick pay, family leave pay), salary exchange arrangements, expense claims and payments, loans, deductions, share option schemes, bank account details, grade, social security number, tax information, third party benefit recipient information, copy driving licence if provided with a pool/hire car or car allowance, details of any benefits you receive or are eligible for (which includes but is not limited to details about private medical cover and life assurance where applicable), pension scheme and contribution details;
- *Regulatory and compliance data:* information relating to the Company's compliance with legal and regulatory requirements including in relation to obtaining airside passes for relevant roles and renewal of the same every three to five years (to include renewed criminal record check and reference check), information about criminal offences provided by you, medical certificates for relevant roles, pilot and driving licences for relevant roles and training records for relevant roles, any records of your registration with any applicable regulatory authority, your regulated status and any regulatory certificates and references;
- *Time, attendance and leave information:* time and attendance records, absence records (including dates and categories of leave/time off requests and approvals), holiday dates, requests and approvals relating to family leave (such as maternity, paternity, parental, adoption, shared parental, dependents), information relating to special leave (such as trade union duties and activities, employee representative duties, public duties, jury service, armed forces etc.);
- *Absence, incapacity and disability management data:* completed medical questionnaire issued post offer, absence history, fit notes, details of incapacity, details of work impact and adjustments, details of treatment and prognosis, Manager and HR communications, return to work interviews, meeting records, medical reports, occupational health reports, crew data from recordings of calls to the crewing line;

- *Health and safety data:* health and safety screening requests and results (where applicable), personal data in audits, risk assessments and incident and accident reports and data included in medicals and health surveillance carried out in respect of engineering staff and medicals carried out in respect of airside drivers and forklift truck drivers;
- *Flexible working procedure data:* requests, consideration, correspondence, meeting notes and outcome records;
- *Equality and diversity data:* where permitted under local law and provided voluntarily, data regarding gender, age, race or ethnic origin, nationality, religious or philosophical belief and sexuality;
- *Learning and development:* information relating to training or development received and learning and development needs including names of course, feedback and certificates/qualifications obtained, data from recordings and transcriptions of calls on customer facing phone lines;
- *Performance, Talent and Succession data:* Colleague and Manager feedback, performance reviews, targets and objectives, performance improvement and development plans, data from recordings and transcriptions of calls on customer facing phone lines, career progression plans, performance management records and outcomes including any warnings, participation in and assessment under talent and succession programs (to include talent grids, succession plans and assessment of seasonal workers);
- *Disciplinary and grievance data:* the allegations, complaints, investigation and proceeding records and outcomes including any warnings;
- *Whistleblowing data:* where applicable, information in connection with any disclosure to the whistleblowing hotline by you or relating to you and subsequent investigation;
- *Restructure and redundancy data:* change plans, organisation charts, consultation records, selection and redeployment data;
- *Monitoring data (to the extent permitted by applicable laws):* closed circuit TV footage, system and building login and access records, call recordings and logs (including recordings and transcriptions of calls on customer facing phone lines, and recordings of calls on the crewing line), email, IT programmes and Internet access logs, data caught by IT security programmes and filters, drug and alcohol testing data;
- *Colleague claims, complaints and disclosures data:* subject matter of employment or contract based litigation and complaints, pre claim conciliation, communications, settlement discussions, claim proceeding records, employee involvement in incident reporting and disclosures;
- *Informal opinion data:* informal opinion data generated in the course of your engagement in relation to the administration or management of our relationship with you; and
- Any other information which you choose to disclose to Company personnel during the course of your engagement whether in writing (for example by email) or verbally.

Certain additional information may be collected where this is necessary and permitted by local applicable laws.

In addition if you travel with **Jet2.com** or **Jet2holidays** in connection with your role or in a personal capacity as a customer then please refer to the Customer Privacy Policy which can be found at <https://www.jet2.com/privacy> or <https://www.jet2holidays.com/privacy-policy> for details of how and why we may process your personal data in relation to such travel.

Special categories of data

The Company may also collect and process a limited amount of personal data within the data listed above falling into special categories, sometimes called "sensitive personal data". This term includes information relating to such matters as racial or ethnic origin, political opinions, religious or philosophical beliefs, physical or mental health, certain maternity/adoption information, trade union membership, sexual orientation, information regarding sexual life, biometric data, genetic data, criminal records and information regarding criminal offences or proceedings.

How does the Company collect data?

The Company collects and records your personal data from a variety of sources, but mainly directly from you. You will usually provide this information directly to your Managers or HR or enter it into our systems (for example through HR processes, emails you send or through verbal information which may be recorded). In addition, further information about you will come from your Managers or HR.

We may also obtain some information from third parties, for example, references from a previous employer, medical reports from external professionals, tax authorities, benefit providers or where we employ a third party to carry out a background check or vetting or in relation to operation of the whistleblowing hotline (where applicable).

In some circumstances, data may be collected from monitoring devices or in other ways (for example, building and location access control and monitoring systems, closed circuit television, telephone logs and call recordings and email, IT programmes and Internet access logs). When this happens the data may be collected by the Company or a third party provider. This data may be accessed, for example, in relation to customer complaints, Data Subject Access Requests, where we are investigating possible breaches of Company policies (such as the CCTV and IT Security for all policies (copies of which can be found on the intranet)), use of the telephone system and the internet, colleague conduct generally, for performance management, for training and development and for managing absence.

Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection and if particular information is required by the contract or statute we will tell you about this. Please note that if you do not provide any mandatory information then that will mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases, it may mean that we are unable to continue with your employment or engagement as the Company will not have the personal data we believe to be necessary to manage our relationship with you.

Apart from personal data relating to yourself, you may also provide the Company with personal data of third parties, in particular your dependents and other family members, for HR administration and management (for example the administration of benefits and to contact your next-of-kin in an emergency). Before you provide such third party personal data to the Company you must first tell these third parties of any such data which you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.

Why do we process your data and what are the legal grounds for that processing?

Your personal data is collected and processed for various business purposes, but primarily to ensure that those who work for the Company are suitable and appropriate and to administer and manage

your engagement effectively in line with your contract, our policies and procedures and applicable laws.

Data protection laws require us to tell you what legal basis we use for processing your data. These bases are set out in the applicable data protection law. We generally process your personal data under one of the following grounds:

- the processing is necessary for compliance with a legal obligation to which the Company is subject (for example disclosing the information to HMRC, making statutory payments, avoiding unlawful termination or discrimination, meeting statutory record keeping requirements or health and safety obligations);
- where there is no legal obligation we will process your data where the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract (for example collecting bank details to pay your salary or processing information to provide you with the contractual benefits you are entitled to);
- where the two grounds above do not apply we may process your personal data where the processing is necessary for the legitimate interests pursued by the Company or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;
- in exceptional circumstances where we have no legitimate interest but you ask us to process data for a particular purpose we may carry out the processing on the basis of your consent (for example if you ask us to provide pay information to a bank for a mortgage application made by you). Where we rely on this we will make this clear to you.

The detail of our legitimate interest in particular processing will vary depending on our business purpose. However, in overall terms we have a legitimate interest in attracting and retaining engaged, motivated, high calibre individuals to work for us; and in securing, defending, managing and developing our business and our people in line with our policies and procedures and in line with our legal and regulatory obligations. Our processing is designed to support these aims. This is important to enable us to deliver our commitments to our customers; to protect our reputation; and to achieve our immediate and longer term business objectives.

We have set out in further detail at Appendix 1 of the purposes we may use your personal data for and the legal basis we rely upon each case.

Special categories of data

Sometimes we process data about you which the law considers to fall within special categories (see section above for further detail) The legal bases for processing special category data are set out in the applicable law, and we generally process such data under one of the grounds set out above and also by one of the following grounds:

- the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
- the processing is necessary for the purposes of preventative or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;

- the processing is necessary to protect your vital interests or those of another person where they/you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);
- the processing is necessary for purposes authorised by applicable law. This includes those purposes set out in schedule 1 of the Data Protection Act 2018:
 - the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Company or you in connection with employment, social security or social protection;
 - the processing is necessary for health or social care purposes to include the purposes of: preventative or occupational medicine; assessment of working capacity; medical diagnosis; provision of health care or treatment; provision of social care; management of health care systems or services or social care systems or services;
 - the processing is necessary for reasons of substantial public interest authorised by local law including:
 - ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted and maintained and racial and ethnic diversity at senior levels of an organisation;
 - processing necessary for preventing or detecting unlawful acts which must be carried out without consent of the data subject so as not to prejudice those purposes;
 - processing necessary for the exercise of a protective function (dishonesty, malpractice, other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association, failure in the service provided by a body or association) which must be carried out without consent of the data subject so as not to prejudice that function;
 - processing necessary for regulatory requirements relating to unlawful acts, dishonesty, malpractice or other seriously improper conduct in circumstances where the controller cannot reasonably be expected to obtain consent of the data subject;
 - processing necessary for the provision of confidential counselling, advice or support or other similar service provided confidentially;
 - processing necessary for an insurance purpose for the purposes of measures or decisions with respect to you;
 - processing necessary for making a determination in connection with eligibility for benefits payable under an occupational pension scheme;
 - the processing is necessary for the establishment, exercise or defence of legal claims;
 - in exceptional circumstances the processing is carried out subject to your explicit consent (see below).

We may seek your consent to certain processing which is not otherwise justified under one of the above grounds. If consent is required for the processing in question then it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such

processing will be provided to you at the time that consent is requested along with the impact of not providing any such consent. You should be aware that it is not a condition or requirement of your employment or engagement that you agree to any request for consent from the Company.

We have set out further detail at Appendix 2 of the purposes we may use your special category personal data for and the legal basis we rely upon in each case.

Processing relating to criminal convictions and offences

The legal bases for processing personal data relating to criminal convictions and offences or related security measures is set out in the applicable law, including at schedule 1 of the Data Protection Act 2018. This includes processing necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment or for reasons of substantial public interest including: processing necessary for preventing or detecting unlawful acts which must be carried out without consent of the data subject so as not to prejudice those purposes; processing necessary for the exercise of a protective function (namely a function which is intended to protect members of the public against dishonesty, malpractice or other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association or failures in services provided by a body or association) which must be carried out without consent of the data subject so as not to prejudice that function; processing necessary for the purpose of complying with regulatory requirements relating to unlawful acts, dishonesty, malpractice or other seriously improper conduct in circumstances where the controller cannot reasonably be expected to obtain consent of the data subject.

Personal data relating to criminal convictions and offences will be processed as set out below:

- Any information provided on application forms or at any time during employment regarding any criminal offence will be processed to help ensure the safety and security of our Colleagues, customers and others. Such processing is authorised by applicable laws including those set out above, namely it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment and for reasons of substantial public interest (including preventing or detecting unlawful acts, for the exercise of a protective function, regulatory requirements relating to unlawful acts and dishonesty etc.).
- A basic disclosure criminal record check will be carried out in relation to all roles on recruitment and related information processed to help ensure the safety and security of our Colleagues, customers and others. In relation to those in relevant roles processing of basic disclosure criminal record checks is also carried out in order to obtain and renew airside passes in accordance with legal and regulatory requirements. Such processing is authorised by applicable laws including those set out above, namely it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment and for reasons of substantial public interest (including preventing or detecting unlawful acts, for the exercise of a protective function, regulatory requirements relating to unlawful acts and dishonesty etc.).
- An allegation of a criminal offence or conviction arising during your relationship with the Company may be processed where required or authorised by applicable law, for example: where we have a legal or regulatory requirement to report an offence; or applicable laws authorise the Company to process information about the offence (e.g. in a disciplinary process) for the purpose of making a decision regarding your relationship with the Company.

Automated decision making and profiling

We do not currently rely on automated decision making.

How long do we keep your personal data?

The Company endeavours to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable.

We generally retain personal data for as long as is required to satisfy the purpose for which it was collected. This will usually be the period of your employment/contract with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law. However, some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

Who do we share your data with?

Within the Company, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:

- Local or Regional HR, including Managers and team members;
- Local, Regional, and Executive Management responsible for managing or making decisions in connection with your relationship with the Company or when involved in a HR process concerning your relationship with the Company (including, but not limited to Colleagues from IT, Finance and/or Legal);
- System administrators; and
- Where necessary for the performance of specific tasks or system maintenance by Colleagues in IT, Legal or Finance.

Certain basic personal data, such as your name, location, job title, contact information and any published skills and experience profile may also be accessible to other Colleagues.

Your personal data may also be accessed by third parties whom we work together with to provide us with services such as hosting, supporting and maintaining the framework of our HR or other IT systems. Personal data may also be shared with certain interconnecting systems and local payroll and benefits systems and data contained in such systems may be accessible by providers of those systems, their affiliates and sub-contractors. Examples of other third parties with whom your data will be shared include tax authorities, regulatory authorities, government agencies and law enforcement authorities, the Company's insurers, brokers, bankers, IT administrators, providers of car hire services, travel service providers, lawyers, auditors, investors, consultants, other professional advisors, administrators of the Company's benefits programs, occupational health providers and counselling providers and providers of vetting services.

We may share your data with government agencies and law enforcement authorities. We may need to share your personal data to fulfil our purposes for processing your personal data and/or because those third parties need to process your personal data for their own purposes (such as to safeguard national security and prevent and detect crime). In addition, we may also share personal data with national authorities in order to comply with a legal obligation to which we are subject.

The Company expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security. Where these third parties

act as a "data processor" they carry out their tasks on our behalf and upon our instructions for the purposes mentioned above. In this case your personal data will only be disclosed to these parties to the extent necessary to provide the required services.

Transfer of personal data

From time to time your personal data (including special categories of personal data) will be transferred to the other associated companies other than the company that employs you under your contract of employment or engages you under your contract for services to process for the purposes described in this Privacy Notice. Personal data may also be transferred to third parties, as set out above who may have systems or suppliers located outside of the UK or European Union.

In relation to Crew travelling to destinations in the United States of America we are required to transfer to the US Department of Homeland Security ("**DHS**") certain travel and reservation data about Colleagues flying between the UK and the United States of America in accordance with an International Agreement between the UK and the United States. US authorities use this information for preventing and combating terrorism and other transnational serious crimes. For further information about the way in which the DHS uses this data please see: www.dhs.gov and this [PDF](#).

In relation to Crew or Colleagues working overseas, depending on the country you are travelling to we may also be required to share your information with other border agencies in the destination countries.

As a result, your personal data may be transferred to countries outside of the country in which you work or outside of the UK or European Union to countries whose data protection laws may be less stringent than ours.

The Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws. Where required by applicable data protection laws, the Company has ensured that service providers sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction as applicable.

The Company is committed to protecting the security of the personal data you share with us. A number of the measures we use to protect information are set out in IT Security Policy for All (which is available on the intranet).

What are your rights?

You have several rights in relation to your personal data and an explanation of each of those rights is set out below.

Right to access, correct and delete your personal data

The Company aims to ensure that all personal data are correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to us so that we can ensure that your data is up-to-date.

You have the right to request access to any of your personal data that we may hold, and to request correction of any inaccurate data relating to you. You also have the right to request deletion of any irrelevant data we hold about you.

To correct/update information, please contact HR Administration at hradministration@jet2.com.

Additional rights

You also have the following additional rights:

- *Data portability* - where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- *Right to restriction of processing* - you have the right to restrict our processing of your personal data where:
 - you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
 - where the processing is unlawful but you do not want us to erase the data;
 - where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
 - where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

- *Right to withdraw consent* - where we are relying upon your consent to process data, you have the right to withdraw such consent at any time. You can do this by contacting your HR Business Partner or HR Advisor.
- *Right to object to processing justified on legitimate interest grounds* - where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

You also have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes applicable law.

For further information regarding your rights, or to exercise any of your rights, please contact dataprotection@jet2.com or your HR Business Partner or HR Advisor.

Appendix 1

No.	Purpose for processing	The lawful basis we rely on
a)	<p>Recruitment and selection Considering your suitability to work for us in the role you have applied for, comparing you to other candidates and making recruitment decisions.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including the requirement to ensure we do not unlawfully discriminate during recruitment and the requirement to make reasonable adjustments where appropriate in the event you have a disability.</p> <p>Processing beyond legal compliance is necessary for taking steps at your request to enter into a contract with you. Where you have applied to work for us we need to use your personal data to ensure that you are suitable for the role you have applied for and to make an offer to you where appropriate.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - We have a legitimate interest in fully assessing applicants to ensure that only suitable and appropriate candidates are selected, to compare candidates and make a fair decision on the most appropriate candidate for the position. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.
b)	<p>Pre-employment verification and screening Appropriate pre-employment verification and screening including, where relevant and appropriate, identity check, right to work verification, credit check, reference check, employment check, relevant professional qualifications check, medical certificate, pilot/driving license check.</p> <p>Further verification and screening during your engagement with the Company to comply with aviation laws and regulatory requirements to include in relation to the provision of airside passes, medical certificates for relevant roles and license checks.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including establishment of the right to work in the country in which you are employed and aviation laws and regulatory requirements (including those in relation to the obtaining and renewal of airside passes (requiring a basic criminal record check and 5-year employer reference check), medical certificates for relevant roles and pilot/driver license checks).</p> <p>Where verification and screening is not legally required we rely on the ground that processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in ensuring that candidates and Colleagues do not pose an unacceptable risk to the business, customers or others and considers the verification carried out necessary to prevent crime and other unlawful acts, to protect the business and customers from fraud, dishonesty and incompetence and to ensure the safety of Colleagues, customers and others. <p>Criminal record checks are necessary for the purposes of performing or exercising obligations or rights imposed or conferred on the Company or you in connection with employment (namely legal and regulatory requirements) and/or for reasons of substantial public interest including: preventing or detecting unlawful acts, the exercise of a protective function (namely a function which is intended to protect members of the public against dishonesty, malpractice</p>

	<p>Any information provided on applications forms as to any criminal offence will be processed.</p> <p>Basic disclosure criminal record checks will be carried out on recruitment and related information processed to help ensure the safety and security of our Colleagues, customers and others. In relation to those in relevant roles processing of basic disclosure criminal record checks is also carried out in order to obtain and renew airside passes in accordance with legal and regulatory requirements.</p>	<p>or other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association or failures in services provided by a body or association) and for the purpose of complying with regulatory requirements relating to unlawful acts, dishonesty, malpractice or other seriously improper conduct.</p>
c)	<p>Offers of employment and on-boarding</p> <p>Making job offers, providing contracts of employment or engagement and preparing to start your employment or engagement where you accept an offer from us.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including the requirement to issue written terms of employment and the requirement not to unlawfully discriminate in the terms of any offer to you.</p> <p>Additional processing is necessary to take steps to enter into the contract between you and the Company and to perform that contract because we will need information to make an appropriate offer to you and administer your contract if you join us.</p> <p>The remainder of the processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in ensuring the effective engagement of Colleagues on appropriate terms and conditions and that there is a smooth transition into employment or engagement for successful candidates and that information supplied in the recruitment process which is relevant to ongoing employment or engagement is maintained. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.
d)	<p>Recruitment feedback and complaints</p> <p>To deal with any query, challenge or request for feedback received in relation to our recruitment decisions.</p>	<p>This processing is necessary for compliance with legal obligations to which the Company is subject including ensuring that we are able to demonstrate our compliance with data protection laws and anti-discrimination laws.</p> <p>Beyond legal compliance processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in being able to provide feedback to candidates and to be able to defend any claim made in connection with our recruitment decision. This will assist the Company to avoid the risk of costs incurred through challenges to recruitment decisions and to maintain its reputation.

e)	<p>Pay, pension and benefits Providing and administering remuneration, benefits and incentive schemes and reimbursement of business costs and expenses and making appropriate tax and social security deductions and contributions.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including the provision of statutory payments, pension and benefits to you and complying with the requirements of the tax authorities in relation to tax and social security.</p> <p>Beyond legal compliance processing is also necessary to perform the contract between you and the Company in order to provide and administer the payments, pension and benefits we have agreed to provide to you as part of your contract of employment or engagement.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business. This includes ensuring that Colleagues are properly remunerated and that this remuneration is set at an appropriate level and properly administered. Effective remuneration and management will help to attract and retain engaged, motivated high calibre individuals. This is important to help the Company to achieve its immediate and long-term business goals and outcomes.
f)	<p>Allocating and managing work Allocating and managing duties and responsibilities and the business activities to which they relate.</p>	<p>Some of this processing is necessary for compliance with legal obligations including the requirement to manage your working time in line with statutory limits on working time and to manage statutory leave and time off entitlement.</p> <p>Additional processing is necessary to perform the contract between you and the Company to ensure that you carry out the role under your contract of employment or engagement.</p> <p>Further processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business. This includes ensuring the effective allocation and organisation of work amongst Colleagues and ensuring that each member of staff has clearly defined duties and responsibilities and undertakes appropriate duties. Effective people management in this way is important to enable the Company to carry out its commitments to customers and to manage its resources efficiently and effectively. This will support the Company to achieve its immediate and long-term business goals and outcomes.
g)	<p>Identifying and communicating with you Identifying and communicating effectively with Colleagues.</p>	<p>Using your data to communicate with you is necessary for compliance with legal obligations to which the Company is subject including the need to communicate with you regarding processes governed by employment laws (e.g. a consultation exercise or investigation) or as part of our duty of care towards you.</p> <p>Beyond legal compliance, processing is necessary to perform the contract between you and the Company. There needs to be communication between you and the Company to fulfil your contract.</p> <p>Additional processing is necessary for the purpose of the</p>

		<p>legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business. This includes effective communication and maintaining a dialogue with Colleagues operationally and in relation to their terms and conditions of employment/engagement and relationship with the Company; - The Company also has a legitimate interest in contributing to appropriate business protection by ensuring that Colleagues can be identified; - The Company also has a legitimate interest in facilitating effective and efficient communication and collaboration between Colleagues; to support Colleagues to engage with internal customers and stakeholders; and to help our Colleagues to work together for the benefit of the business and our customers. Effective communication is important for the fair management of Colleagues and attracting and retaining engaged, motivated high calibre individuals. Effective collaboration between Colleagues is important to ensure the effective organisation and delivery of work and support successful delivery of commitments to customers and enable effective business performance. This is important to support our immediate and long-term business goals and outcomes.
h)	<p>Management processes Managing and operating conduct, performance, capability, absence and grievance and whistleblowing related reviews, allegations, complaints, investigations and processes and making related management decisions.</p>	<p>This processing is necessary for compliance with legal obligations to which the Company is subject including our duty of care towards you, to avoid unlawful dismissal and comply with anti-discrimination laws, aviation laws and regulatory requirements, health and safety laws, and regulatory laws.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - We have a legitimate interest in managing our workforce and operating our business. This includes putting in place appropriate policies and procedures for Colleagues and taking action if they are not complied with. It includes setting appropriate standards of attendance, behaviour and performance and taking appropriate action where standards are not met or maintained. It also includes addressing Colleague related concerns and issues, resolving the same and complying with our policies and procedures. Effective people management is important to maintain standards, meet commitments to customers and to protect our reputation. It is also important to attract and maintain engaged, motivated high calibre individuals. This will support achievement of our immediate and long-term business goals and outcomes. <p>We also have a legitimate interest in ensuring that our business, customers, Colleagues and systems are protected and that action is taken to mitigate risk and to prevent and detect matters which may put the Company or others at risk. This includes detecting and preventing crimes or criminal activity or other unlawful or unethical activity and ensuring compliance with other legal or regulatory requirements placed upon us or related official guidance. It also includes providing ways for Colleagues and others to report conduct or compliance issues and the appropriate consideration and</p>

		investigation of matters drawn to our attention. Effective business protection is important for business continuity, to protect our reputation and the safety and security of our Colleagues, customers and others. This supports our immediate and long-term business goals and outcomes
i)	Performance and talent management Managing and operating performance reviews and talent programmes.	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in setting objectives for Colleagues to ensure that Colleagues are aligned to the needs and goals of the Company and to measure the achievement of Colleagues against those objectives; - The Company has a legitimate interest in assessing the development needs of Colleagues to ensure the highest standards of performance and to support career development and succession planning; - The Company also has a legitimate interest in assessing the potential of Colleagues to develop their careers within it and to developing Colleagues towards their career goals while ensuring the maintenance of a pool of talent for succession planning; - The Company has a further legitimate interest in ensuring an appropriate performance related measure to support fair, consistent, objective performance related reward and to support performance assessment for the purpose of other HR processes. Effective people management and development is important to maintain standards, meet commitments to customers and to protect our reputation. It is also important for business continuity and to attract and maintain engaged, motivated high calibre individuals. This will support achievement of our immediate and long-term business goals and outcomes.
j)	Training, development and succession planning Training, development, promotion, career and succession planning and business contingency planning.	<p>Some processing is necessary for compliance with legal obligations to which the Company is subject including aviation laws and regulatory requirements in relation to training for those in relevant roles.</p> <p>Some processing is necessary to perform the contract between you and the Company.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - We have a legitimate interest in managing our workforce and operating our business. This includes ensuring that all Colleagues undertake appropriate duties, are properly trained and undertake their role correctly and in accordance with appropriate procedures. It also includes ensuring that there are succession and contingency plans in place so that the business can continue to be successful and maintain knowledge, skills and relationships where Colleagues leave the business for any reason or in the event of an interruption in normal business conditions. This also includes supporting and developing our personnel in their career to help us retain engaged, motivated, high calibre individuals. Effective business and workforce management in this way is important to maintain business standards and continuity, ensure the safety of our Colleagues, customers and others and to

		support our long-term business goals and outcomes.
k)	Workforce relations Consultations or negotiations with Colleagues or representatives of Colleagues.	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including consultation obligations when there is a business or service transfer, a significant restructure and other situations laid down in applicable employment laws.</p> <p>Beyond legal compliance processing this processing is also necessary for the purpose of the legitimate interests pursued by the Company where the consultation is not a statutory matter:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in seeking the views of its workforce and those that represent them on proposals which will impact on Colleagues such as the development of new policies or working practices. Effective workforce engagement helps ensure the Company makes the best decisions for the business and is important to attract and retain high calibre individuals. This will support the Company to achieve its immediate and long-term business goals and outcomes.
l)	Workforce engagement Conducting surveys for benchmarking and identifying improved ways of working and workforce engagement.	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in seeking the views of its workforce and giving them the opportunity to raise concerns or suggest improvements. Effective workforce engagement helps ensure we make the best decisions for the business and is important to attract and retain high calibre individuals. This will support the Company to achieve its immediate and long-term business goals and outcomes.
m)	Absence and incapacity management Processing medical information regarding physical or mental health or information about absence to: make adjustments to duties or the workplace; determine fitness for work; facilitate a return to work; make management decisions regarding employment/engagement or continued employment/engagement or redeployment; conduct related management processes; assess eligibility for incapacity or permanent disability related remuneration or benefits; provide counselling services; ensure health and safety.	<p>Some processing is necessary for compliance with legal obligations to which the Company is subject including health and safety laws, our duty of care to Colleagues, providing statutory incapacity benefits, avoiding unlawful dismissal, compliance with disability discrimination laws and aviation laws and regulatory requirements.</p> <p>Beyond legal compliance some of this processing is necessary to perform the contract between you and the Company including the provision of payments and benefits relating to absence or incapacity.</p> <p>Additional processing is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company considers that it has a legitimate interest in managing and supporting its workforce, managing health and safety risk and operating its business. This includes supporting the welfare of Colleagues and taking steps to ensure fitness for work and to manage absence and incapacity impacting on the ability of Colleagues to perform their roles. It also includes taking steps to identify and mitigate risks to the health, safety or welfare of Colleagues, customers and others. Effective support and management of Colleagues supports business performance and the attraction and retention of high calibre individuals. This supports our immediate and long-term business goals and outcomes.
n)	Restructuring and change programmes	<p>This processing is necessary for the compliance with legal obligations to which the Company is subject including where</p>

	Planning, managing and carrying out restructuring or redundancies or other change programmes including appropriate consultation, selection, alternative employment searches and related management decisions.	<p>relevant in relation to redundancies and other potential terminations due to business reasons. This includes appropriate consultation, appropriate selection where relevant, consideration of alternatives in the event that employment on the same terms or role cannot be continued and other procedural steps laid down by law to avoid unlawful dismissals.</p> <p>Additional processing beyond legal compliance is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its business operations in the most effective way and making decisions in order to preserve its business operations or grow or modernise its business; - The Company also has a legitimate interest in ensuring appropriate Colleague engagement in transformation or change proposals and fair and effective implementation of its decisions impacting on Colleagues. Business change and transformation is important to ensure business continuity and to support our immediate and long-term business goals and outcomes.
o)	<p>References</p> <p>Complying with reference requests where the Company is named by the individual as a referee.</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company and potential new employers:</p> <ul style="list-style-type: none"> - It is in the legitimate interests of a new employer to receive confirmation of basic employment details from the Company for the purposes of confirming a former Colleague's employment history including dates of employment, role and, if appropriate, reason for leaving. More detailed information would only be provided if you consented to the Company providing such information. Such consent would be entirely voluntary and would be sought at the time before additional information was provided.
p)	<p>Operating company policies & procedures and network protection</p> <p>Operating email, IT, Internet, social media, HR related and other company policies and procedures. the Company carries out monitoring of IT systems to protect and maintain the integrity of its IT systems and infrastructure; to ensure compliance with its IT policies and to locate information through searches where needed for a legitimate business purpose.</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business and protecting its business and all stakeholders (including customers, Colleagues and shareholders) from various risks. This includes putting in place appropriate policies and procedures for Colleagues, measuring compliance, detecting breaches and taking action if they are not complied with. It also includes appropriate protection of the IT network, systems and business devices to maintain the integrity and security of data and business information and facilitating record management. Effective policy and procedure compliance and IT management including breach detection are important to maintain business standards, ensure business continuity and to protect our reputation and the safety of our Colleagues, customers and others. This is important to support our long-term business goals and outcomes. The IT Security for All policy can be found on the Company intranet.
q)	<p>Other monitoring - to include closed circuit TV footage, system and</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company:</p>

	<p>building log in and access records, call recordings and logs, alcohol and drug testing</p> <p>For the purposes of: security, prevention and detection of inappropriate and unlawful activity and health and safety,</p>	<p>- The Company has a legitimate interest in seeking to ensure the security of its operations, prevent and detect inappropriate and unlawful activity and ensure the health and safety of its workforce, stakeholders (including customers, Colleagues and others) and the public. This includes managing its workforce and protecting its business, stakeholders and the public from various risks, to protect the safety and security of the business and such stakeholders and the public, to protect our reputation and to maintain business standards.</p>
r)	<p>Operating company policies and procedures in relation to call recording.</p> <p>For the purpose of dealing with customer claims and complaints, fulfilling subject access requests, performance management, training and development, managing absence and colleague conduct generally.</p>	<p>Some processing is necessary for compliance with legal obligations to which the Company is subject.</p> <p>Beyond legal compliance, additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <p>The Company has a legitimate interest in managing its workforce and operating our business. This includes ensuring that all Colleagues undertake appropriate duties, are properly trained and undertake their role correctly and in accordance with appropriate procedures. This also includes supporting and developing our personnel in their career to help us retain engaged, motivated, high calibre individuals. Effective business and workforce management in this way is important to maintain business standards and continuity, ensure the safety of our Colleagues, customers and others and to support our long-term business goals and outcomes.</p>
s)	<p>Health, Safety, security and preventing and detecting inappropriate or unlawful activities</p> <p>Health, safety and security; satisfying our legal and regulatory or other obligations to supervise the persons employed or engaged by us; and preventing, detecting and investigating a wide range of activities and behaviours and liaising with regulatory authorities.</p>	<p>Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including aviation laws and regulatory requirements, health and safety laws, our duty of care, obligations in relation to data provided to DHS pursuant to international agreement between the EU and US and regulatory laws to which the Company is subject.</p> <p>Beyond legal compliance, additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <p>- The Company has a legitimate interest in ensuring that its business, customers, Colleagues and systems are protected and that action is taken to mitigate risk and to prevent and detect matters which may put the Company or others at risk. This includes carrying out risk assessments; detecting and preventing crimes or criminal activity or other unlawful or unethical activity; ensuring that only appropriate Colleagues are engaged in our business; and ensuring compliance with other legal or regulatory requirements placed upon us or related official guidance. It also includes providing ways for Colleagues and others to report conduct or compliance issues and the appropriate consideration and investigation of matters drawn to our attention. Effective business protection is important for business continuity, to protect our reputation and the safety and security of our Colleagues, customers and</p>

		others. This supports our immediate and long-term business goals and outcomes.
t)	Business information protection Protecting the private, confidential and proprietary information of the Company, its Colleagues, its customers and third parties.	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company considers that it has a legitimate interest in ensuring that its business, customers, Colleagues and systems are protected. This includes protecting our assets and the integrity of our systems; and detecting and preventing loss of confidential and proprietary information. This is also important to comply with our obligations to our customers and Colleagues to protect their information and assets. Effective business protection is important for business continuity and to protect our reputation. This supports our immediate and long-term business goals and outcomes.
u)	Legal compliance Complying with laws and regulation applicable to the Company (for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws, aviation laws and regulatory requirements, obligations in relation to data provided to DHS pursuant to international agreement between the EU and US and other regulation to which the Company is subject in the conduct of its business).	<p>This processing is necessary for the compliance with legal obligations to which the Company is subject.</p>
v)	Ensuring equality of opportunity Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws.	<p>This processing is necessary for the compliance with legal obligations to which the Company is subject including anti-discrimination laws.</p> <p>Where not legally required this processing is necessary for the public interest of ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained.</p> <p>Beyond the above processing is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <p>The Company has a legitimate interest in ensuring equality of opportunity or treatment between people of different age, sex, racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation</p>

		<p>- The Company has a legitimate interest in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace. Ensuring equality and diversity ensures attraction and retention of high calibre individuals, protects our reputation and supports the Company in achieving its long-term business goals and outcomes.</p>
w)	<p>Commercial transactions or outsourcing Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving the Company that impacts on your relationship with the Company (for example mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules).</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including under automatic transfer rules.</p> <p>Processing beyond legal compliance is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its business operations in the most effective way. The Company needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business or maximise efficiency and effectiveness; - In the event that the Company makes a decision to outsource a function or acquire or transfer a business or part of a business, the Company and the third party with whom it is seeking to transact each have a legitimate interest in ensuring that the workforce, Colleague costs and liabilities are sufficiently understood prior to committing to the transaction and to ensure a smooth transition of Colleagues if a transaction goes ahead. Business change programmes and transformation support business continuity and improvement and support the Company in achieving its long-term business goals and outcomes.
x)	<p>Business reporting For business operational and reporting documentation such as the preparation of annual reports.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including statutory company reporting obligations and corporate governance requirements.</p> <p>Processing beyond legal compliance is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business, ensuring appropriate governance and controls are in place and to measure and report on financial management and business performance. This includes appropriate preparation of management information reports; financial accounts and other reports including in relation to HR metrics; reporting for internal and external governance; and liaising with third parties such as investors or finance providers. Effective management information and reporting is important for effective management of the business, risk management and decision making. This supports business continuity and is important to support our long-term business goals and outcomes.
y)	<p>Business development and stakeholder management To operate the relationship with third parties such as suppliers including disclosure of information</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in ensuring that it can engage with suppliers effectively and that suppliers can access the information they need to provide the service for which they have been engaged. Effective business development and successful relationships are important for

	to data processors for the provision of services to the Company.	business continuity and growth. Effective communication with and engagement of suppliers is important for business continuity and improvement. This supports the achievement of our immediate and long-term goals and outcomes.
z)	Communication and public relations Where relevant for publishing appropriate internal or external communications or publicity material including via social media in appropriate circumstances.	Some of this processing is necessary for the purpose of the legitimate interests pursued by the Company: - The Company has a legitimate interest in communicating effectively with its workforce, customers, other stakeholders and the public as well as carrying out appropriate business development activity. That includes giving information to the workforce or, where appropriate customers, other stakeholders or the wider public about relevant business activities, plans or projects. That can include making reference to those of our Colleagues who are involved in the relevant matters being communicated above. Effective communication and engagement contributes to attraction and retention of high calibre individuals, development and retention of customer relationships, strong business performance, business growth and maintaining and enhancing our reputation. This supports our immediate and long-term business goals and outcomes.
aa)	HR administration To support HR administration and management and maintaining and processing general records necessary to manage the employment, worker or other relationship and operate the contract of employment or engagement.	Some of this processing is necessary for compliance with legal obligations to which the Company is subject including in particular employment laws, health and safety laws, data protection laws, aviation laws and regulatory requirements and other regulatory laws. Our HR policies and procedures are designed to enable our compliance with laws relevant to the relationship with you. Beyond what is necessary for legal compliance processing is necessary to perform the contract between you and the Company including any express and implied terms of the contract such as the effective administration of hours of work and provision of pay and benefits. Additional processing is also necessary for the purpose of the legitimate interests pursued by the Company: - The Company has a legitimate interest in managing its workforce and operating its business. Our systems, policies and procedures are designed to support the fair, consistent and effective management of the relationship with Colleagues and the effective communication with and engagement of Colleagues. Effective workforce management facilitates strong business performance and the attraction and retention of high calibre individuals. This supports our immediate and long-term business goals and outcomes.
bb)	Access controls To set and change access permissions to locations and systems.	Some of this processing is necessary for compliance with legal obligations to which the Company is subject including in particular data protection laws, health and safety laws, aviation laws and regulatory requirements and our duty of care. Beyond legal compliance processing is also necessary to perform the contract between you and the Company. The Company needs to provide access to appropriate locations and systems to enable Colleagues to fulfil their duties for the Company while maintaining its duty of care and other express

		<p>and implied contractual duties towards you.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in managing its workforce and operating its business. This includes facilitating access to appropriate locations and systems. It also includes controlling and restricting access to ensure appropriate business protection. This is necessary to ensure safety and security of Colleagues and others and to protect our systems, assets and information. It is also necessary to protect the information relating to third parties such as customers which we may hold. To facilitate this the Company needs to control access to sites, sensitive business areas, systems, files etc. To be effective these must be monitored and kept up to date. IT is a key part of this control. This supports the achievement of our immediate and long-term business goals and outcomes.
cc)	<p>HR record and system management</p> <p>To manage and maintain HR records, files and systems including technical support and maintenance for HR information systems and managing electronic and hard copy records in line with our HR retention policy.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including data protection laws and aviation laws and regulatory requirements.</p> <p>Beyond legal compliance processing is necessary to perform the contract between you and the Company including ensuring that the information needed to operate the express and implied terms of your contract is kept secure, maintained and up to date.</p> <p>Additional processing is also necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company considers that it has a legitimate interest in managing its workforce and operating its business. This includes maintaining the integrity and security of data and facilitating records management, ensuring information remains up to date and deleting information when it is no longer required. IT is a key part of managing this effectively and efficiently. Effective information management is key to the successful management and administration of the relationship with Colleagues. Effective Colleague information management supports the attraction and retention of high calibre individuals, strong business performance and the safety of Colleagues, customers and others. This supports the achievement of our immediate and long-term business goals and outcomes.
dd)	<p>Complaints, claims and litigation</p> <p>To enforce our legal rights and obligations, and for any purposes in connection with any complaints or legal claims made by, against or otherwise involving you.</p>	<p>Some of this processing is necessary for compliance with legal obligations to which the Company is subject including demonstrating compliance with employment and health and safety laws and data protection laws.</p> <p>Beyond legal compliance processing is necessary to perform the contract between you and the Company including the enforcement of our rights under that contract.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company considers that it has a legitimate interest in

		protecting itself from breaches of legal obligations owed to it and to defend itself from litigation. This is needed to ensure that our legal rights and interests are managed appropriately, to protect our reputation and to protect the Company from other damage or loss. This is important to protect the business of the Company and ensure its continued success and growth. This supports our immediate and long-term business goals and outcomes.
ee)	Legal or regulatory disclosures To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation aviation, data protection, tax and employment), whether within or outside your country.	<p>This processing is necessary for compliance with legal obligations to which the Company is subject where there is a legal obligation to disclose information or a court or other legal order to provide information is place.</p> <p>Where not legally required, processing is necessary for the purpose of the legitimate interests pursued by the Company:</p> <ul style="list-style-type: none"> - The Company has a legitimate interest in co-operating with relevant authorities, government bodies or regulators for the provision of information where appropriate. The Company wishes to maintain its reputation as a good corporate citizen and to act ethically and appropriately in all the countries in which it does business. <p>This encourages compliance and high standard of business practice and protects our reputation. This supports our immediate and long-term business goals and outcomes.</p>

Appendix 2

No.	Purpose for processing	Additional lawful basis for special category data processing
a)	Documentation such as work permits, details of residency, proof of citizenship will be processed to assess and review eligibility to work for the Company in the jurisdiction in which you work.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular the requirement to check that you are legally permitted to work in your jurisdiction.
b)	Your racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status may be used for the collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or to keep our commitment to equal opportunity under review.	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular compliance with anti-discrimination legislation.</p> <p>Where not legally required this processing is necessary for the public interest of ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained.</p>
c)	Health and medical information may be used to comply with employment, health and safety, aviation or social security laws. For example, to carry out statutory risk assessments and regular health and safety assessments, provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer our private medical and long term disability schemes, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard. It	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular, those laws set out in this section.</p> <p>To the extent that this data is managed by occupational health advisors, this processing is necessary for the purposes of preventative or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.</p> <p>The processing is necessary for purposes authorised by applicable law. This includes those purposes set out in schedule 1 of the Data Protection Act 2018 including:</p> <ul style="list-style-type: none"> • necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Company or you in connection with employment, social security or social protection. • necessary for health and social care purposes to

	will also be used to comply with aviation laws and regulatory requirements in relation to relevant roles. It may also be used for health and social care purposes.	<p>include: the purposes of preventative or occupational medicine; assessment of working capacity; and medical diagnosis; provision of health care or treatment.</p> <ul style="list-style-type: none"> necessary for the provision of confidential counselling, advice or support or other similar service provided confidentially.
d)	Health information of you or an appropriate family member may be used where necessary for pension purposes e.g. where you apply for ill health retirement or in relation to assessing dependent entitlements.	This processing is necessary for the purposes of making a determination in connection with eligibility for benefits payable under an occupational pension scheme.
e)	Health information may be used where necessary for insurance purposes e.g. income protection assessment and administration.	This processing is necessary for insurance purposes for the purposes of measures or decisions with respect to you.
f)	Details of Trade Union membership may be processed to ensure that any relevant rights that you may have in connection with any Trade Union membership are complied with, as required to enable us to meet our obligations under employment law.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular human rights laws relating to freedom of association and assembly, laws relating to our interaction with Trade Union members and officials and avoiding detrimental treatment relating to Trade Union membership or activities.
g)	Special category personal data of any type may be used in the management and investigation of any complaint under our grievance, whistleblowing, anti-bullying and harassment or similar policies and procedures or disciplinary procedures where such information is sufficiently relevant to the	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular employment laws relating to the effective management of complaints and avoiding unlawful dismissals, anti-discrimination laws and our duty of care to Colleagues.

	particular complaint or issue.	
h)	Special category personal data of any type may be used in the event of a complaint, claim or litigation or potential claim or litigation by, against or involving you.	This processing is necessary to establish, exercise or defend legal claims.

Appendix A – Document Control

1 Document Control

Policy:	Data Protection Policy	Date of Issue:	November 2021	Related Policies and Systems:	Data Protection Policy
Owner:	Data Protection Officer	Review Date:	October 2021		IT Security Policies
Colleagues:	All colleagues, workers, contractors, sub-contractors (as defined in "Colleagues" above)	Version:	<u>2.0</u>		CCTV Policy
		Scope:	Group		

2 Document History

Version	Description of Change	Date of Issue
Version 1.0	New document for introduction of GDPR	May 2018
Version 2.0	Updates following policy review and PLC name change.	November 2021