



## ATIL Internet Privacy Notice

### Introduction

ATIL is required by Data Protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use personal data collected from our internet site.

This Privacy Notice does not imply any contractual rights.

### What is Personal Data?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

Data Protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, criminal offences or convictions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as **special category** data. (The remainder is treated as **ordinary personal data**).

### Who is the Controller?

ATIL is the "Controller" for the purposes of Data Protection law. This means that the Company is responsible for deciding how we hold and use personal data about you.

### What happens to my data if I apply for a job within the Company?

Please see the Job Applicant Privacy Notice which can be found in a link under the 'Our People' section of ATIL's internet site.

### What happens to other personal data sent by email/post to ATIL?

Any personal data sent to ATIL is directed to the relevant person for action. Personal data will be restricted to only those who require it to fulfil a contractual or legislative requirement on behalf of the Company and/or support a business need.

Please note that all emails including any attachments sent to ATIL are monitored for reasons of security and compliance and may be blocked and/or deleted.

### **Does ATIL share personal data?**

We will only share your personal data with third parties where there is an appropriate legal ground under Data Protection law i.e. where legally required your personal data may be shared with Government departments and/or enforcement bodies.

### **How is personal data stored?**

Security of personal data is of paramount importance and is assured by the controls applied to the ATIL Business System and/or physical data repositories. The storage controls of the personal data will be managed and maintained by the data owner.

### **How long does ATIL retain the personal data and what happens to it at the end of the retention period?**

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting, contractual or regulatory requirements that specify how long certain records must be kept

At the end of the retention period the data will be deleted or overwritten when retained on the business system or if it is in hard copy, it will be securely destroyed by cross shredding or via an approved third-party shredding company.

## **Is my personal data shared outside of the European Economic Area (EEA)?**

Some information concerning you may be processed by The Boeing Company and its subsidiaries in the United States (U.S.) and in other countries around the globe. As a global company, The Boeing Company can achieve important business efficiencies (e.g., operating as “One Boeing”) by consolidating information about employees, and other individuals about whom the company has employment related (or human resources) Personal Information, in centralised databases and systems located at Boeing facilities in the U.S. or with subsidiaries or third parties who host applications on Boeing’s behalf. The primary company system of record for human resources data is located in the U.S. This system also shares Personal Information with other systems and databases hosted by or on behalf of Boeing, however, these other systems and databases will only Process Personal Information in accordance with, and as permitted by applicable laws, including having a legal basis to transfer information to another jurisdiction when required.

In addition to legal provisions such as statutory compliance, fulfillment of contract and treaty compliance, Personal Information transferred to the U.S. from the EU and Switzerland will be protected according to the commitment of The Boeing Company and its subsidiaries to principles of the EU-U.S. (and Swiss-U.S.) Privacy Shield Framework (<https://www.privacyshield.gov/list>). This protection extends to the service providers who process data on Boeing’s behalf, for which Boeing is responsible. Boeing is subject to the investigatory and enforcement powers of the Federal Trade Commission with regard to the Framework.

## **What about cookies?**

Cookies are pieces of data that are often created when you visit a website. The cookie information collected by ATIL does not include any personal data and is anonymous.

## **What choices do I have?**

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove personal data** that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.

- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If you would like to exercise any of the above rights or have any questions or concerns about how your personal data is being used by ATIL, please contact the Data Protection Lead (HR Manager) in writing by email - [jnelson@atil.co.uk](mailto:jnelson@atil.co.uk) or by post - ATIL, Unit 2, Coldharbour Business Park, Sherborne, Dorset, DT9 4JW.

Note that these rights are not absolute and in some circumstances, we may be entitled to refuse some or all of your request.

Note too that you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

### **Updating this privacy notice**

This privacy notice will be updated from time to time to reflect internal and external changes as to how personal data is managed. If a significant change to this notice occurs all data subjects affected will be notified.