



## NHV Privacy Policy

### **1. Introduction**

NHV Group NV, and all of its subsidiaries (together “NHV”) are committed to protecting your privacy and upholding best practices in data and privacy security. NHV handles your personal data in strict compliance with all data protection regulatory obligations, including but not limited to General Data Protection Regulation (EU) 2016/679 (“GDPR”). This Privacy Policy details how we collect, handle, store, or otherwise process personal information submitted to us. It may be updated from time to time by posting an updated version on our website. Please check regularly for updates.

### **2. Sharing data within NHV**

NHV Group NV is a company registered in Belgium with registered office at Kalkaertstraat 101, 8400 Oostende and with registration number 0544.424.376. NHV Group NV is the ultimate holding company of a group of companies, but it does not trade. NHV Group NV has a number of direct and indirect subsidiary companies, which are all covered by this Privacy Policy. Within the group, our processing activities are supported by centralised databases and systems which may be hosted or managed by a NHV company on behalf of another NHV company. Additionally, and for efficiency purposes, certain operation and commercial functions may be performed by one NHV company on behalf of the other.

Each subsidiary (respectively the one you are interacting with) may act as a controller of Personal Information as defined in the GDPR, and the group company or companies are a processor of that information on behalf of the other group company (which is the controller).

### **3. Scope of this privacy policy**

NHV processes personal information from a variety of individuals, including passengers, suppliers, customers, visitors and (prospective) employees primarily processed for the following reasons:

- Passengers: to generate manifests and flight plans to ensure safe flight operations
- suppliers: to manage the supplier contracts
- visitors: to ensure access is given to the property in a safe manner
- other individuals: to respond to (online) queries and/or employment candidacies

### **4. What Personal Information we process?**

Personal information (hereinafter “Personal Information”) is data which identifies you as a natural person either directly, or indirectly. NHV may process:

- personal details, including: first name, surname, home address, telephone number, email address, etc.;
- professional information;
- financial information;
- biographical and health-related information.

The type of personal information NHV may process depends on the nature of your relationship with NHV.

For clarification purposes 'processing' means any operation performed on personal information, including but not limited to collection, using, managing, consulting or disclosing.

NHV does not process any Personal Information on children.

## 5. Why we process Personal Information

NHV only processes Personal Information if we have a proper reason for doing so, commonly referred to as the "lawful basis":

- (a) upon consent: for specific purposes agreed upon by the data subject in a consent form
- (b) as part of the execution or conclusion of a contract: to execute and manage customer and supplier contracts
- (c) to comply with all legal and regulatory obligations to which we are subject, including:
  - implementation of legislation (such as the GDPR and aviation law);
  - tax and accounting obligations;
  - transportation safety obligations.
- (d) for purposes that are in our legitimate interest, in which case we seek to preserve a proportionate balance between our legitimate interest and respect for your privacy. In this context, your data can be processed in order to:
  - monitor and investigate compliance with company policies and procedures;
  - security and safety;
  - normal business operation;
  - maintaining appropriate business records;
  - protect property;
  - prevent abuse and fraud;
  - exercise, defend and preserve our rights, for example during litigation, as well as to compile the proof of a possible violation of our rights.

## 6. How we protect Personal Information

NHV finds the security of Personal Information essential to conduct its business and as such NHV takes all appropriate technical and organizational measures to ensure adequate safety and protection of Personal Data against loss or any form of careless, incompetent or abusive use or processing. These technical and organizational measures are regularly audited.

## 7. Retention period of Personal Information

NHV will not store Personal Information any longer than required for the purpose for which such information (i) is processed, (ii) is necessary to enable NHV to meet its legal obligations, (iii) is necessary to respond to any inquiries or claims, (iv) is necessary in order to secure the systems of NHV or (v) is necessary to keep up appropriate business documentation. In assessing the retention period of Personal Information, NHV shall carefully balance the need to retain the Personal Information with

the rights and freedoms of data subjects, and whereby any retention period will be determined reasonable, proportionate and with a minimal privacy impact. As an example, Personal Information provided by you in relation to a request for information or to subscribe to a newsletter will only be stored for one year after such request or for one year following the termination of the subscription.

## **8. Sharing Personal Information with third-parties**

NHV may be required to transfer your Personal Information to a third party who will process your Personal Information for the purpose(s) as set out above. When doing so, NHV is committed to ensure that any third party also upholds at a minimum the same standards and practices on data security as NHV.

Examples whereby NHV may share Personal Information to third parties are

- Service providers, business consultants or vendors that process Personal Information on NHV's behalf (e.g. a service provider who drafts the flight manifest);
- Insurers, banks, lawyers, accounts, auditors or other professional advisors;
- Emergency services.

NHV may disclose Personal Information when NHV reasonably believes that such action is required to comply with legal obligations, including contract obligations, or to respond to lawful requests by public authorities.

In any circumstances, NHV do not and will never sell your data to anyone.

## **9. Sending Personal Information outside the European Economic Area (“EEA”)**

Data transfers to the United Kingdom

NHV has a subsidiary in the United Kingdom. According to the European Parliament resolution of 21 May 2021 on the adequate protection of personal data by the United Kingdom (2021/2594(RSP)), the United Kingdom provides an adequate level of data protection and no further requirements are needed to transfer data to the United Kingdom. Should there be a change regarding this adequacy decision, NHV will take all necessary measures to make sure the data transfers to the United Kingdom are compliant with the applicable legislation.

Data transfers to other countries outside the EEA

NHV only sends data outside the EEA if this is essential for the purpose(s) of the process of Personal Information as set out above. When NHV would transfer Personal Information outside the EEA, NHV makes sure that is afforded an adequate level of data protection. We will use one of the below safeguards to ensure such protection:

- transfer the data to a non-EEA country which has privacy laws at least as protective as those within the EEA (known as EU adequacy decision); or
- enter into a written agreement with the recipient of the data binding the recipient to protect data to the same standards as required within the EEA.

## 10. Your rights as a data subject

Data protection law empowers you and give you control over the data you share with various organisations. Below are your rights as a data subject outlined.

In order to reasonably assist us with locating your data, when making a request on the below heads we ask that you provide the following basic information:

- your full name
- the email address associated with your request
- a rough time frame of what period you are requesting your data from
- any other information you may have to assist us searching for your data.

We aim to respond to requests within one calendar month of identity verification of the requestee, however we reserve the right to extend this by a further two calendar months in the event of complex or numerous requests.

Should your request be deemed manifestly unfounded or excessive in nature we reserve the right to refuse to fulfil your request or charge a flat fee to process it further.

- (a) The Right to be informed: you have the right to receive confirmation from us that we are processing your data.
- (b) The Right of access: you are entitled to request a copy of all the personal data currently processed by us as well as the following information about your data:
  - the lawful basis and purpose of processing
  - the categories of data processed
  - the recipients with whom the data has been shared
  - the actual or envisioned retention period
- (c) The Right to rectification: we take all reasonable steps to ensure that your data that we process is accurate and up-to-date. For whatever reason you believe that the data that we process is either inaccurate or incomplete, you are able to request that we correct or complete this data.
- (d) The Right to erasure: you have the right to request the erasure of your data when there is no valid reason for us to continue processing it. Please note that the right to erasure is not absolute and certain data may be retained for overriding legal purposes.
- (e) The Right to restrict processing: you have the right to request that we suspend processing your data without full erasure in the following circumstances:
  - you believe the data we process is inaccurate;
  - you believe the processing of your data is being done unlawfully, but do not wish for us to erase it;
  - when you require us to store the data for longer than the retention period prescribed in order to establish, exercise or defend legal claims; or
  - you have exercised your right to object and we are currently verifying whether overriding ground to continue processing exists.

- (f) The Right to data portability: you may request your personal data be transferred to another controller or processor in a commonly used, machine-readable format. Please be aware that this right is only able to be exercised when all the below grounds apply:
  - the processing is done on the lawful basis of consent;
  - the processing is done so by automated means; and
  - the processing is for the fulfilment of a contractual obligation.
- (g) The Right to object: where we process your data on the lawful basis of “legitimate interest” you may exercise your “right to object” to such processing. Please be aware that we reserve the right to continue processing your personal data in such a way as long as we are able to justify the legitimate reasons to do so.
- (h) The Right to withdraw consent: when we process your data on the lawful basis of consent you are entitled to withdraw this at any time. Withdrawal of consent does not affect the legality of the processing of your data during the time when your consent was still active and valid. There may be circumstances whereby we are still entitled to process your data for overriding legal or regulatory purposes.

If you wish to take action of any of the above rights, please visit our [data request form](#). Alternatively, you may contact our dedicated data protection team at [privacy@nhv.be](mailto:privacy@nhv.be) who can assist you with your request.

## 11. Questions and complaints

If you have any other question or you are concerned about an alleged breach of privacy law or any other regulation by NHV, you can contact NHV at the following address: NHV – Legal Department, Kalkaertstraat 101, 8400 Oostende, Belgium or at [privacy@nhv.be](mailto:privacy@nhv.be).

If you are not satisfied with the way in which NHV handles your complaint, you have the right to complain to the national data protection supervisory authority responsible for the protection of personal data in the country where you live or work, or in a country which you think a breach of data protection laws has taken place.

People in Belgium can contact the Gegevensbeschermingsautoriteit/ Autorité de Protection des Données by telephone on +32 (0)2 274 48 00 or by using the online contact form available through the Gegevensbeschermingsautoriteit/ Autorité de Protection des Données website at <https://www.dataprotectionauthority.be/citizen>

People in the UK can contact the Information Commissioner’s Office by telephone on +44 (0)303 123 1113, or by using the live chat service which is available through the Information Commissioner’s website [www.ico.org.uk](http://www.ico.org.uk).

People in France can contact the Commission Nationale de l'Informatique et des Libertés by telephone on +33 (0)1 53 73 22 22 or by writing to the Commission at 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France.

People in the Netherlands can contact the Autoriteit Persoonsgegevens by telephone on +31 (0)70 888 85 00 or by writing to the Autoriteit Persoonsgegevens at Postbus 93374, 2509 AJ DEN HAAG.

People in Denmark can contact the Datatilsynet by telephone on +44 33 19 32 00, by e-mail to [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) or by writing at Datatilsynet, Carl Jacobsens Vej 35, DK-2500 Valby.