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Overview

Who we are

Aeropeople Ltd. (a wholly owned subsidiary of the Marshall Aerospace and Defence Group Ltd.) are a provider of both recruitment and aviation maintenance services.

Scope

Our business activities require us to engage in the processing of the personal data of those wishing to use or using our recruitment services (referred to throughout as 'a candidate') and those that work for a third party we are engaging or engaged with our recruitment or aircraft services. An example of a third party is an employee of a client.

Aeropeople works closely with its parent company Marshall Aerospace and Defence Group Ltd (Marshall ADG Ltd.) to provide training offerings under the brand Marshall Academy (formerly AeroAcademy). This includes the operation of our online training platform www.aeropeopletraining.com. Please view Marshall Academy's privacy information here <http://aeroacademy.co.uk/privacy-notice/> to understand how your data is processed when engaging in online training.

This Privacy Notice sets out the basis on which Aeropeople Limited will process personal information provided to us, this information is also referred to as 'personal data'. Aeropeople Limited is referred to throughout as "we", "us", "our" and "ours". For the purposes of this Privacy Notice, our commercial activities and services for individuals and businesses are referred to as 'Recruitment services' and 'Aircraft related services' the later relates to maintenance and technical support. Actual or potential customers are referred to as 'Clients'.



Matters related to our employee's, or potential employee's, personal data are covered by the Marshall ADG privacy employee notice; as employees of the Group. All employees of Aeropeople who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured; where required. In order to ensure that the personal data we hold is accurate and up to date, we request that you inform us of any relevant changes to the personal information we hold about you.

Unrequired data (provided via online registration and email)

Any data that is provided to Aeropeople that is unnecessary, insufficient or inappropriate to the provision of our services will be permanently destroyed. This will include CVs and other speculative information that we are unable to process due to legislation or the protection of our business. Data will not be destroyed, where the same is required for the purpose of establishing, exercising or defending legal claims, to protect our legitimate interests or in compliance with legal obligations

Our Data Privacy Manager can be contacted directly here:

Email - dataprivacymanager@marshalladg.com

Direct phone (0)1223 373206

Engaged or engaging with Aeropeople as a Candidate

This section applies to individuals wishing to use or using our Recruitment Services or ('a Candidate):

The personal data we may collect or receive includes the following (as applicable):

- Name
- Address
- Email and other contact details
- Date of birth
- Job history (including information relating to placements through us)
- Educational history, qualifications and skills
- Visa and other right to work or identity information
- Passport
- Bank details
- National insurance and tax (payroll) information
- Personal information relating to hobbies, interests and pastimes
- Information contained in references and pre-employment checks from third parties
- sensitive personal information e.g. health data (see 'Sensitive Personal Data' - page 6)
- Your marketing preferences
- Next of kin details (to be used in emergency situations)
- Contact details of referees



We may obtain your personal data from the following sources (please note that this list is not exhaustive):

- You (e.g. a Curriculum Vitae, application or registration form)
- A client (recommendation)
- Other candidates (recommendations)
- Online jobsites (also known as job boards)
- Marketing databases
- The public domain
- Social Media
- At interview
- Conversations on the telephone or video conferencing (which may be recorded)
- Notes following a conversation or meeting
- Our website contact form and the online registration/job application processes

The personal data we collect regarding a candidate will be used for the following purposes:

- Collecting and storing your personal data, whether in manual or electronic files
- Notifying you of potential roles or opportunities
- Assessing and reviewing your suitability for job roles
- Introducing and/or supplying you to actual or potential Clients
- Engaging you for a role with us or with our Clients including any related administration e.g. timesheets and payroll
- Collating market or sector specific information and providing the same to our Clients
- Sending information to third parties with whom we have or intend to enter into arrangements which are related to our Recruitment Services
- Providing information to regulatory authorities or statutory bodies, and our legal or other professional advisers including insurers
- To market our Recruitment Services
- Retaining a record of our dealings
- Establishing quality, training and compliance with our obligations and best practice
- For the purposes of backing up information on our computer systems

Our reasons for processing:

Our legal basis for processing personal data:

- The Conduct of Employment Agencies and Employment Businesses Regulations 2003. For example, we are required to verify the identity of the potential candidate, establish their suitability to be put forward as a candidate and keep records to prove we have operated in the correct manner.
- Where we engage a person to work for us, supplied to a Client, there are other statutory obligations that must be complied with including payroll, tax, social security, HMRC reporting requirements, and any other law or regulation.
- We are also required to comply with statutory and regulatory obligations relating to business generally, for example complying with tax, bribery, fraud/crime prevention and data protection legislation, and co-operating with regulatory authorities such as HMRC or the Information Commissioner's Office.



Entering and performing a contract with you:

- In order to provide our Recruitment Services, we will enter into a contract with you and/or a third party. In order to enter into a contract, we will need certain information, for example your name and address. A contract will also contain obligations on both your part and our part and we shall process your data as is necessary for the purpose of those obligations. For example, in order to process payroll, a national insurance number and bank details will be required.

Our legitimate interests (carrying on the commercial activity of Recruitment Services):

In providing our Recruitment Services, we will carry out some processing of personal data which is necessary for the purpose of our legitimate interests, which include:

- Retaining records of our dealings and transactions and where applicable, use such records for the purposes of:
 - establishing compliance with contractual obligations with Clients or Suppliers
 - addressing any query or dispute that may arise including establishing, exercising or defending any legal claims
 - protecting our reputation
 - maintaining a backup of our system, solely for the purpose of being able to restore the system to a particular point in the event of a system failure or security breach
 - evaluating quality and compliance including compliance with this Privacy Notice
 - determining staff training and system requirements
- Using your personal data to:
 - assess suitability and contact you regarding, comparable, potential opportunities and/or our services
 - collate market information or trends including providing analysis to potential or actual Clients (the result of analysis will be anonymised before sending where possible)
 - source potential opportunities or roles as part of our Recruitment Services
 - personalise your experience and our offering, whether via our website or otherwise

This means that for our commercial viability and to pursue these legitimate interests, we may continue to process your personal data for as long as we consider necessary for these purposes.

If you wish to question the retention or processing of any of your data, please contact dataprivacymanager@marshalladg.com.



Consent

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example, if you apply for a specific role you may have consented to our processing of the data that has been provided for the purpose of progressing your application and considering your suitability for that role. In other cases, you may have provided your written or verbal consent to the use of your data for a specific reason.

You may withdraw your consent to our processing of your personal information for a particular purpose at any stage; to do so please email mydata@aeropeople.com. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

Who we share personal data with:

We shall not share your personal information unless we are entitled to do so. The categories of persons with whom we may share your personal information include:

- Individuals, hirers and other third parties necessary for the provision of our Recruitment Services. An example of this is when an individual informs us that they have chosen to use a compliant payroll provider (also known as an umbrella).
- Any regulatory authority or statutory body pursuant to a request for information or any legal obligation which applies to us
- Parties who process data on our behalf, which will include where appropriate:
 - IT support (provided by Marshall ADG Ltd)
 - storage service providers including cloud
 - background screening providers; where we are required to or are requested to complete or assist with an application.
- Legal and professional advisers
- Insurers

Automated decisions

We may use software to review the personal data of individuals recorded on our database, or who have applied for specific roles. The software may identify and raise to our attention individual personal information according to stored characteristics. For example, the software may enable us to quickly identify individuals from our database who have specific skills, e.g. an engineer and exclude individuals whose characteristics do not match the requirements of a job role.

Where we use software to assist us with our assessment of your suitability for a particular job role and you consider that any such assessment has been made wrongly or incorrectly, you may ask for an explanation; for this please email mydata@aeropeople.com.



What if we obtain your personal data from a third party?

Part of our business activity involves researching information relating to individuals for the purposes of filling job roles. This may include obtaining personal data from online sources, for example we may obtain information from social media sites such as LinkedIn and job boards, some information being publicly available but others being from sites or providers to which we subscribe. From time to time we may also receive personal information about you from hiring organisations, colleagues and former employers, or from persons for whom you have provided services or been otherwise engaged.

Where information from third party sources is of no use to us, or where you have notified us that you do not want us to provide you with services, we shall discard it, however we may maintain a limited record in order to avoid the duplication of process. Where we consider that information may be of use to us in pursuance of the provision of our Recruitment Services, any processing will be in accordance with this Privacy Notice. You do have the right to object to processing, please see 'Your rights' on page 11 of this document.

Sensitive Personal Data (SPD)

Sensitive personal data is information which is intensely personal to you and is usually irrelevant to our consideration of your suitability for a job role. Examples of SPD include information which reveals your political, religious or philosophical beliefs, sexual orientation, race or ethnic origin, or information relating to your health.

Regardless of the basis for your dealings with us, we request that you do not provide us with any sensitive personal data unless absolutely necessary. However, to the extent that you do provide us with any sensitive personal data, such as data which you choose to share with us in conversation, we shall only use that data for the purposes of our relationship with you or for the provision of our Recruitment Services. This will be for one or more of the following reasons:

- You have explicitly consented to the processing
- For the purpose of our assessment of your suitability for job roles or working capacity
- Where processing is necessary for the purpose of obligations or rights under employment, social security or social protection law
- To maintain records of our dealings to address any later dispute, including but not limited to the establishment, exercise or defence of any legal claims



Engaged or engaging with Aeropeople as an employee or representative of a Third Party

This section applies where you are an individual working for a third party with whom we have dealings. For example, a client or a payroll company.

The personal data we may collect or receive includes the following (as applicable):

The personal data we collect or receive in relation to an employee of a **third party** is:

- Your contact information, which may include your full name, job role, contact telephone number and email
- Where appropriate, your statements and opinions about candidates and/or other personnel e.g. a reference
- Information relating to our relationship with you or the party for whom you work including records of any meetings or discussions
- Your marketing preferences

We may obtain your personal data from the following sources (please note that this list is not exhaustive):

- You, including where you have provided us with your contact details or other information for the purposes of using our Recruitment or aircraft related services
- Staff or other representatives of the organisation you represent
- Candidates
- Marketing databases
- Social media
- The public domain
- Conversations, with you or others, on the telephone or video conferencing (which may be recorded) or in meetings
- Notes following a conversation, with you or others, or meetings you attend

How we will use your personal data:

We will process your personal data in the context of our dealings with the third party for whom you work and as part of our services. Processing may include:

- Collecting and storing your personal data, whether in manual or electronic files
- Using the data to communicate with you
- Sending information to third parties with whom we have or intend to enter into arrangements which are related to our Recruitment Services
- Actions necessary to further any obligation on us pursuant to a contract between ourselves and the third party you work for
- Collating market or sector specific information and providing the same to our clients
- Providing information to regulatory authorities or statutory bodies and our legal or other professional advisers including insurers



- Retaining records of our dealings with you and the organisation whom you represent
- Establishing quality, training and compliance with our obligations and best practice

Why we process your personal data:

Compliance with legal obligations (regulatory and statutory obligations)

We must comply with a number of statutory provisions when providing our Recruitment Services, which necessitate the processing of personal data. These include the *Conduct of Employment Agencies and Employment Businesses Regulations 2003*, which amongst other things requires us to obtain information from Clients.

When providing aircraft related services (including some aspects of recruitment) we are required to comply with multiple authorities bodies and the legislation they publish; for example EASA and CAA.

We are also required to comply with statutory and regulatory obligations relating to business generally, for example tax, bribery and fraud/crime prevention legislation, and co-operating with regulatory authorities such as HMRC.

Our legitimate interests (carrying on the commercial activity of Recruitment Services):

In providing our services, we will carry out some processing of personal data which is necessary for the purpose of our legitimate interests, which include:

- Using your personal data:
 - to contact you regarding our Recruitment and or Aircraft related services (as appropriate)
 - to assess suitability of Candidates and roles, for example, referencing or other feedback
 - to collate market information or trends including providing analysis to potential or actual Clients
 - as otherwise necessary to provide our Recruitment Services and/or to meet our obligations towards either the party whom you represent, or other Clients or suppliers
 - to personalise your experience and our offering, whether via our website or otherwise
- Retaining records of our dealings and transactions and where applicable, use such records for the purposes of:
 - establishing compliance with contractual obligations with Clients or suppliers
 - addressing any query or dispute that may arise including establishing, exercising or defending any legal claims
 - protecting our reputation
 - maintaining a backup of our system, solely for the purpose of being able to restore the system to a particular point in the event of a system failure or security breach



- evaluating quality and compliance including compliance with this Privacy Notice
- determining staff training and system requirements

For our commercial viability and to pursue these legitimate interests, we may continue to process your personal information for as long as we consider reasonably appropriate for these purposes.

If you wish to question the retention or processing of any of your data, please contact dataprivacymanager@marshalladg.com.

Consent

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example, if you have provided your contact details in order that we may use these to provide you with details of our services you may have consented to our processing of the data for that purpose. In other cases you may have provided your written or verbal consent to the use of your data for a specific reason, for example an employment reference.

You may withdraw your consent to our processing of your personal data for a particular purpose at any stage; to do so please email mydata@aeropeople.com. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

Who we share personal data with

We shall not share your personal data unless we are entitled to do so. The categories of persons with whom we may share your personal information include:

- Candidates and other third parties necessary for the provision of our Recruitment Services
- Any regulatory authority or statutory body pursuant to a request for information or any legal obligation which applies to us
- Parties who process data on our behalf, which may include
 - IT support (provided by Marshall ADG Ltd)
 - storage service providers including cloud providers
 - background screening providers
- Legal and professional advisers
- Insurers



What if we obtain your personal data from a third party?

Part of our business activity involves researching information for the purposes of finding and filling job roles. This may include obtaining personal data from sources including job boards, advertisements, LinkedIn or other social media, some information being publicly available but others being from sites or providers to which we subscribe. From time to time we may also receive personal data about you from hiring organisations, colleagues and former employers, or from persons for whom you have provided services or been otherwise engaged.

Where information from third party sources is of no use to us we shall discard it, however we may maintain a limited record in order to avoid the duplication of process. Where we consider that information may be of use to us in pursuance of the provision of our Recruitment Services, any processing will be in accordance with this Privacy Notice. You do have the right to object to processing, please see page 11 'Your rights'.

Sensitive Personal Data (SPD)

Sensitive personal data is information which is intensely personal to you and is usually irrelevant to our dealings with you in respect of our Recruitment Services. Examples of SPD include information which reveals your political, religious or philosophical beliefs, sexual orientation, race or ethnic origin, or information relating to your health.

Regardless of the basis for your dealings with us, we request that you do not provide us with any sensitive personal data unless absolutely necessary.

However, to the extent that you do provide us with any sensitive personal data, such as data which you choose to share with us in conversation, we shall only use that personal data for the purposes of our relationship with you or for the provision of our Recruitment Services. This will be for one or more of the following reasons:

- You have explicitly consented to the processing
- Where processing is necessary for the purpose of obligations or rights under employment, social security or social protection law
- To maintain records of our dealings to address any later dispute, including but not limited to the establishment, exercise or defence of any legal claims



Relevant to all individuals (data subjects)

Retaining your data

In most circumstances your data will not be retained for more than 6 years from the last point at which we provided any services or otherwise engaged with you contractually. It is our policy to only store your personal data for as long as is reasonably necessary for us to comply with our legal obligations and for our legitimate business interests.

However, we may retain data for longer than a 6-year period where we have a legal or contractual obligation to do so, or we form the view that there is otherwise a continued basis to do so, for example where your personal information identifies specialist skill sets which may remain in demand, or we are subject to a legal obligation which applies for a longer period. If, however you believe that we should delete your personal data at an earlier date, please inform us in writing of your reasons; please email mydata@aeropeople.com. Following a request, we will review the data we hold on you and explain the action we have taken as a result of your request.

For more information on retention of data please refer to our Groups retention policy which can be found here: <http://marshalladg.com/privacy-notice/>

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Aeropeople Ltd. refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined on page 14 of this document.



All requests to exercise your rights will be forwarded on should there be a third party involved in the processing of your personal data. If you have any questions concerning your rights or should you wish to exercise any of these rights, please contact our data privacy manager: dataprivacymanager@marshalladg.com

Please find our template subject access request document here: <http://marshalladg.com/privacy-notice/>

Transfer of data to other jurisdictions

In the course of the provision of our services we may transfer data to countries or international organisations outside of the EEA. This may, for example, be to Clients or Candidates, or third parties who provide support services to us. Where information is to be so transferred, it may be to a country in respect of which there is an adequacy decision from the EU Commission. However, if this is not the case, it is our policy to take steps to identify risks and in so far as is reasonably practicable, ensure that appropriate safeguards are in place. Details relating to specific countries or organisations are available on request from mydata@aeropeople.com.

If you do not wish to provide us with necessary data

There may be circumstances where we require you to provide data which is necessary in order for us to meet statutory or contractual obligations, or perform our services. If you do not wish to provide us with information we request, then please notify us. However, please be aware that as a result we may be unable to provide you or the party who you represent with a service, and in some cases, may result in a breach of the contract we have with you or a third party you represent.

Group companies & transfer

Although this Privacy Notice applies to us your data may be accessible to, Marshall Aerospace and Defence Group Limited (Marshall ADG Ltd.) where we have shared administration systems and staff. In the event of a sale, merger, liquidation, receivership or the transfer of all or part of our assets to a third party, we may need to transfer your information to a third party. Any transfer will be subject to the agreement of the third party to this Privacy Notice and any processing being only in accordance with this Privacy Notice.



Cookies

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website, which enables the website to tailor its offerings to your preferences when you visit it. Find out about our use cookies here <http://www.aeropeople.com/downloads/aeropeople-cookie-notice.pdf>

Web Applications and Social Media

Our social media engagement is analysed within the tools provided by LinkedIn and Facebook; the reports generated from this do not provide any identifiable information. Direct communications will not be shared with any other organisations. Please remember that social media providers allow you to set the privacy restrictions on who can view your content and interact with you via this platform We use a third-party provider, Hootsuite to organise our social media posts. If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. For more information please visit <https://hootsuite.com/en-gb/legal/privacy#>

Aeropeople use a third party, Secured Singing for the provision of online document completion, signing and transfer. This provider uses high levels of security to protect your information and only retains the documents transferred for a period of 7 days. For more information please visit www.securedsigning.com/support/faqs.

Aeropeople's training website (www.aeropeopletraining.com) uses the services of PayPal for the management of payment. Information on how PayPal process your personal data can be found by visiting <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>. The training material is hosted on Big Little Pixel, more information can be found by visiting <http://biglittlepixel.com/privacy/>.

Changes to this Privacy Notice

This Privacy Notice is regularly reviewed and may be updated from time to time to reflect changes in our business, or legal or commercial practice. Where an update is relevant to our processing of your data, we shall notify you of the same.



Aeropeople - Privacy Notice

Document Control

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Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Aeropeople Ltd (or third parties as described on page 12), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Aeropeople's Data Privacy Manager.

The details for each of these contacts are:

	Supervisory authority contact details	Data Privacy Manager contact details
Contact Name:	Information Commissioner's Office	Isobel Aylott
Address line 1:	Wycliffe House	Marshall Aerospace and Defence Group
Address line 2:	Water Lane	Airport House
Address line 3:	Wilmslow	Cambridge
Address line 4:	Cheshire	Cambridgeshire
Address line 5:	SK9 5AF	CB5 8RX
Email:	casework@ico.org.uk	dataprivacymanager@marshalladg.com
Telephone:	0303 123 1113	(0)1223 373206

Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all published on www.aeropeople.com

