



## EXTERNAL GDPR PRIVACY NOTICE

### Notes :

- **PC** means Partner Company (NHI Helicopters France, NHI Helicopters Germany, Leonardo, Fokker),
- **PCs** means Partner Companies,
- **PC employee seconded to NHI** means an employee from a PC seconded to NHIndustries,
- **NHI** stands for NHIndustries,

### Introduction

NHIndustries (also known as, "NHI", or "we" or "us") appreciate your interest in our products, services and business lines and your use of our websites, portals and "apps" ("Websites"). Your privacy is important to us and we want you to feel comfortable using our websites. The protection of your privacy and Personal Data is an important concern to which we pay special attention throughout our business processes. Personal Data collected during use of our website is processed by us according to the legal regulations valid for the countries/regions in which the websites is maintained. In addition, our binding corporate rules protect customer and partner data throughout the entire organization. However, the website will include links to other websites or applications which are not necessarily covered by this Privacy Notice. In this event, we encourage you to carefully read the privacy policies of such websites.

NHI is committed to protecting the rights of individuals in line with the **General Data Protection Regulation (reference EU2016/679)** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (hereinafter referred as : 'GDPR') as well as each applicable national Personal Data protection laws and regulations (collectively referred as "Data Protection Laws and Regulations").

### Privacy Notice index

This Privacy Notice will inform you of the Personal Data we collect when you access/use the Website; how we use and disclose your data; how you can control the use and disclosure of your data; and how we protect your Personal Data.

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## What is Personal Data?

Personal Data is information that can be used to identify a person either directly or indirectly (hereinafter referred as: 'Personal Data'). A 'personal identifier' is a piece of information that can identify an individual. This definition covers a wide range of personal identifiers to constitute Personal Data, including name, address, email address, identification number, location data or online identifier.

## Which sources and what Personal Data do we use?

When you use this Website, NHI will collect, use and process any Personal Data you provide us (e.g. your name, date of birth, company name etc.) and any information generated as a result of using the Website, such as IP address, the date and length of visit to the site, the pages you view etc.

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

By using the Website, NHI will collect and process your Personal Data in accordance with this Notice. Your Personal Data may be used for the following purposes (hereinafter referred as: the 'Purposes'):

- Website Browsers / Administration.

We use your Personal Data for administrative purposes, including to help us better understand how our customers access and use our websites and applications; to provide reports to prospective partners, service providers, regulators, and others; to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect our customers, partners and us; and to enforce our policies, directives and processes.

- Marketing.

To the extent permitted by law, we may use your Personal Data for marketing and promotional purposes, including communications through email or equivalent electronic means. For example, we use your Personal Data, such as your email address, to send news and newsletters, special offers, promotions and competitions, or to otherwise contact you about services or information we think will interest you.

- Communication.

We use your Personal Data to communicate with you, including responding to requests for assistance. We can communicate with you in a variety of ways, including email and via your social media accounts if you have agreed, and/or text message.

- Customer service.

We use your Personal Data for customer service purposes, including providing services to you, for technical support or other similar purposes and to establish and maintain customer accounts.

- Research and development.

We use your Personal Data for research and development purposes, including improving our websites, applications, services, and customer experience and for other research and analytical purposes dedicated to improving our products, services, businesses, operations and processes.

- Legal compliance.

We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.

- To protect us and others.

Where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of policies, terms, and other policies.

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

As a responsible company, we need a lawful basis for collecting and/or processing your data. We generally rely on a number of grounds (reasons) for our business processing.

We process your Personal Data in accordance with the provisions set out in the GDPR and the relevant applicable Data Protection Laws and Regulations. The legal basis for processing your Personal Data are:

1. To comply with contractual obligations.

When you subscribe to a particular service through the Website, the purposes of processing your Personal Data are primarily determined by that service and we will process your information so that we can provide that service to you.

2. As a result of your consent.

When you have consented to the processing of your Personal Data by us for certain services through the Website, you can withdraw consent at any time by following the instructions provided in the application process or by contacting us at [dataprotection@nhindustries.com](mailto:dataprotection@nhindustries.com). For further information on the right of withdrawal, please see below Section "Am I obliged to provide my Personal Data?"

3. Within the scope of a legitimate interest.

On occasion we may not need your consent to use your data, given our legitimate interest to do so but we must inform you that we do this; examples of this are:

- For the analysis and optimization of the Website.
- For ensuring IT security and the IT operation of NHI.
- For prevention and investigation of criminal acts.

4. On the basis of NHI' legal obligations or in the public interest.

NHI, as any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for NHI in order to fulfil these obligations.

## Who will receive your Personal Data?

- Authorized persons working for or on behalf of NHI;
- NHI and PCs, on a need-to-know basis for the purposes as outlined in this Privacy Notice;
- Our agents, service providers and advisers (e.g. Third party service providers and advisers providing the variety of products and services we need such as IT maintenance and support, procurement services, compliance and security services, etc.);
- Other authorized third parties in connection with a reorganization or sale of NHI businesses and/or assets;
- Law enforcement or government authorities where necessary to comply with applicable law.

## Will your Personal Data be transferred to a third country/region outside the European Economic Area (EEA)?

NHI processes your Personal Data mostly within France and sometime in Germany, Italy and The Netherlands. On occasion Personal Data may be transferred, on a need-to-know basis, to entities outside the EEA. This transfer is subject to appropriate safeguards, and through the legal framework of our binding corporate rules or through alternative contractual frameworks where a third party is engaged to help us providing web-services to you.

## Which countries/regions will NHI transfer Personal Data to?

Our binding corporate rules allow us to transfer Personal Data within our international organization (PCs), which are structured to allow us to transfer Personal Data to the countries where we have a presence. For NHI, France, Germany, Italy and The Netherlands are where most of our processing of personal information takes place. Personal data can also be transferred to other countries in the frame of specific needs (i.e. travel agencies, airlines, hotels, accommodations, rental car companies, etc.).

## For how long will your Personal Data be stored?

We process and store your Personal Data as long as it is required to meet our contractual and statutory obligations. If your Personal Data is no longer required for the performance of the contractual or statutory obligations, these will be erased on a regular basis unless further processing is necessary, for instance, for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation.

## Security

We use technical and organizational security measures in order to protect the data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons.

Our security procedures are continually enhanced as new technology becomes available.

## What are your rights and how to exercise them?

You may at any time exercise your data protection rights:

- Right to access/obtain a report detailing the information held about you: You have the right to obtain confirmation as to whether or not your Personal Data is being processed by NHI and if so, what specific data is being processed.
- Right to correct Personal Data: You have the right to change any inaccurate Personal Data concerning you.
- Right to be forgotten: In some cases, for instance, when the Personal Data is no longer necessary in relation to the Purposes for which they were collected, you have the right for your Personal Data to be erased.
- Right to stop the processing of your data: You have the right to restrict the processing of your Personal Data by NHI, for instance when the processing is unlawful and you oppose the erasure of your Personal Data. In such cases, your Personal Data will only be processed with your consent or for the exercise or defense of legal claims.
- Right to data portability: Under some circumstances provided by law, you have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit those Personal Data to another data controller.

- Right to object and to withdraw consent: please see below section “Am I obliged to provide by Personal Data?”

To this effect, please contact NHI in writing either by e-mail at the following address: [dataprotection@nhindustries.com](mailto:dataprotection@nhindustries.com) or by writing to the addresses below, enclosing a copy of a document evidencing your identity.

NHIndustries, Security Office - Data Protection Officer  
765 rue Albert Einstein, CS 70402  
13591 Aix-en-Provence Cedex 3  
France

## Am I obliged to provide my Personal Data?

You may at any time object to the processing of your Personal Data or where your consent is required, withdraw such consent by contacting us at [dataprotection@nhindustries.com](mailto:dataprotection@nhindustries.com) . However, please note that if you withdraw your consent, you may not be able to access and use certain information, features or services of the Website.

## To what extent will decision-making be automated?

As a matter of principle, we do not use fully automated decision-making processes. In the event that we should use such processes in individual cases, we will if prescribed by law, specifically inform you of this and of your rights in this respect.

## Will profiling take place?

As a matter of principle, your Personal Data will not be processed automatically with the objective of evaluating certain personal aspects (profiling). In the event that we should process your Personal Data with the objective of conducting profiling, we will, if prescribed by law, specifically inform you of this and of your rights in this respect.

## How can I contact NHI in respect of my Personal Data?

If you are unhappy with the way in which your Personal Data has been processed or should you have questions regarding the processing of your Personal Data, you may refer in the first instance to the NHI Data Protection Officer, who is available for enquiries or complaints, at the following email address: [dataprotection@nhindustries.com](mailto:dataprotection@nhindustries.com) or you can write to the address below:

NHIndustries, Security Office - Data Protection Officer  
765 rue Albert Einstein, CS 70402  
13591 Aix-en-Provence Cedex 3  
France

## Can I ask for assistance to the competent authorities?

If you remain unsatisfied, then you have the right to apply directly to a Data Protection Supervisory Authority. Listed below are the four main European countries where NHI operates and the relevant Supervisory Authority

**FRANCE:** [CNIL: Supervisory Authority France](#)

## Cookies

- What are cookies ?

Cookies are small files that may be downloaded on your device when you access and use our Website. They allow the Website to recognize your device and store information about your preferences or past actions. We use cookies to record the preferences of our users, to enable us to optimize the design of our Website. They ease navigation, and increase the user-friendliness of websites and applications. Cookies also help us to identify the most popular sections of our Website. This enables us to provide content that is more accurately suited to your needs, and, in doing so, improve our service. Cookies can be used to determine whether there has been any contact between us and your device in the past.

Personal details can be saved in cookies, provided that you have consented. For example, cookies may be used to facilitate secure online access so that you do not need to enter your user ID and password again.

- Which cookies do we use ?

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

NAME OF COOKIES	PURPOSE	RETENTION PERIOD
Cookies-banner	Cookies policy approval.	Session duration
Video-played	User experience, to show the intro video once only	+1 month

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

- How can you disable or delete cookies?

If you choose not to accept cookies, you can still access and use our Website. Most browsers automatically accept cookies. You can prevent cookies from being stored on your device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your device at any time. However, if you choose not to accept cookies that are strictly necessary for the provision of our services provided by our Website, it may result in a reduced availability of such services.

For the purpose of statistical analysis, we use analytics tools such as Adobe Analytics, or Google Analytics. You may object at any time to the collection and analysis of statistical data regarding your access to and use of our Website by contacting us using the “contact us” function within our Website.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Modification of the Privacy Notice

NHI will update this Privacy Notice from time to time in order to reflect the changes in our practices and services and also to remain compliant to Data Protection Laws and Regulations. We will inform you of any substantial modification in how we process your Personal Data.