

## Privacy Notice: Data Protection Statement

With this Privacy Notice, we want to inform you about the potential collection and processing of your personal data as well as about the rights you are entitled to in your quality of Data Subject.

We seriously take care of your privacy and we assure our best commitment in the protection of the personal data you may share with us. We will be clear and transparent about the information we are collecting and what we will do with that information. Your personal data will be processed lawfully, fairly and limited to what is strictly necessary, in a manner that ensures appropriate security to that data.

### 1. Controller

The Data Controller who determines the purposes and means of the processing of your personal data is Lufthansa Technik Shannon Ltd, Shannon Airport, Shannon, Co. Clare V95 K097.

If you have further questions on the subject of data protection in connection with the processing of your personal data, please contact our data protection coordinator:

- **Mail:** James Prendeville, Lufthansa Technik Shannon Ltd, Shannon Airport, Shannon, Co. Clare V95 K097
- **E-mail:** James.Prendeville@lht.dlh.de

### 2. Scope and purpose of and legal basis for the processing of personal data

We may collect only basic information about you and your company limited to the following categories:

- Information about you (e.g. name, tax code, date of birth, ID document, address, title/office, curriculum vitae, email, telephone and fax number) and your company (e.g. name, address, VAT and tax code, email, telephone and fax number)
- Information from the communications you exchange with us via letters, emails, calls and social media

### 3. What do we use your personal data for, why and how

We may collect your personal data directly from you (e.g. when you enter into an agreement with us or when you visit our website) as well as from third parties and/or other sources (e.g. internet).

When collected, your personal data may be used for the following purposes:

- To comply with duties and obligations imposed by the law as well as by agreements
- To perform the preliminary activities aimed at entering into a contract with you
- To enter into an agreement with you and to fulfil the obligations set out therein and connected therewith, in particular those imposed by public or private entities
- To perform the services from time to time requested by you
- To manage the tax and administrative obligations connected with agreements
- To grant you the technical support or to exchange with you technical information about goods and/or services requested/purchased;

Your personal data will be collected and processed by means of paper documents and/or telematics and electronic devices. We follow strict security procedures in the storage and disclosure of your personal data also to protect it against accidental loss, destruction or damage. Processing of your personal data is conducted through data management techniques that ensure the confidentiality and security of the information in compliance with article 32 of GDPR and that are consistent with our disclosed purposes in such processing.

As required by EC Regulation No 2320/2002 and the Department of Transport National Civil Aviation Security Programme (NCASP), we also need to obtain information from Shannon Airport Authority/An Garda Síochána to confirm your clearance and approval to work in an airport environment.

#### **4. What legal ground for processing do we have**

We will only process your personal data where we have a legal ground to do so. The legal ground will depend on the reasons we have collected and the requirement to use your personal data. Sometimes your prior consent will not be necessary because other legal grounds set forth in article 6 of GDPR justify the processing of your personal data.

We may collect and process your personal data if:

- You have given your consent to us to the processing of your personal data for one or more specific purposes (e.g. for marketing purposes).
- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
- Processing is necessary for compliance with legal obligation to which we are subject according to Bulgarian, German and/or EU law (e.g. contract obligation).
- Processing is necessary for the performance of a task carried out in the public interest according to Bulgarian, German and/or EU law.

#### **5. Duration of data processing**

Your personal data is erased as soon as it is no longer required for the specified purposes. It may be the case that personal data is retained for the period of time in which claims may be asserted against Lufthansa Technik Shannon Limited. In addition, personal data is stored if and for as long as Lufthansa Technik Shannon Limited is obligated by law to do so. Such documentation and retention obligations are stipulated by Irish law on personal data protection.

#### **6. Right to object in accordance with Article 21 of the GDPR**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data concerning you unless it demonstrates compelling legitimate grounds for the processing, which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Where personal data concerning you is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, the personal data concerning you will no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Privacy and Electronic Communications Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

#### **7. Disclosure of personal data to third party**

We may be required to forward your personal data to third parties within or outside the Lufthansa Technik Shannon Limited in order to be able to offer you our products and services based on our contractual obligations or our legitimate interests. These recipients can be categorized as follows:

- Service providers
- Transportation and logistics

- Marketing
- IT
- Government bodies and authorities
- Members of the Lufthansa Technik Group

In the process, personal data may be transferred to third countries or international organizations. In order to protect you and your personal data, there are suitable safeguards in such cases as stipulated by and in compliance with statutory requirements (in particular the use of EU standard contractual clauses) or there is an adequacy decision adopted by the EU Commission (Article 45 of the GDPR).

We are also obligated by law to provide personal data to Irish and international authorities (Article 6 (1) point (c) of the GDPR in conjunction with local and international regulations and agreements.

## 8. Rights of Data Subjects

Lufthansa Technik Shannon limited is committed to the fair and transparent processing of data. We therefore believe it to be important that data subjects not only have the right to object, but can also exercise the following rights, if the relevant legal requirements are fulfilled:

- Right to access personal data and obtain information (Article 15 of the GDPR)
- Right to rectification (Article 16 of the GDPR)
- Right to erasure ("right to be forgotten") (Article 17 of the GDPR)
- Right to restriction of processing (Article 18 of the GDPR)
- Right to data portability (Article 20 of the GDPR)

You can contact James.Predeville@lht.dlh.de by e-mail to exercise your rights. To handle your request and for the purpose of identification, we note that we will process your personal data in accordance with Article 6(1) (c) of the GDPR.

You also have the right to lodge a complaint with a supervisory authority. The supervisory authority responsible for Lufthansa Technik Shannon limited is:

**Address:** Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

**Phone:** +353 (0)761 104 800  
+353 (0)57 868 4800

**Website:** <https://www.dataprotection.ie/>

## 9. Consent

If you have given us your consent to process your personal data, we note here that you can revoke this consent at any time.

Please note that any revocation of your consent is valid only with future effect and does not have an impact on the lawfulness of past processing of your data. In some cases, we have the right despite the revocation of your consent to continue processing your personal data on another legal basis, such as to fulfil a contract.