



GENERAL DATA PRIVACY NOTICE

UK-LEG-04

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1. INTRODUCTION

Ontic is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you collected from within the UK or the EEA during and after your interaction with us, in accordance with the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018 and the EU General Data Protection Regulation (EU GDPR).

This privacy notice informs you as to how we look after your personal data when you visit the Ontic website (<http://www.ontic.com>) (regardless of where you visit it from), you purchase goods or services from or sell goods or services to us, you respond to a survey from us, you apply for a role with us or otherwise communicate or engage with us including requesting information or marketing communications and tells you about your privacy rights and how the law protects you.

This privacy notice should be read in consort with Ontic's Global Privacy Policy (GP-LEG-22) that is available under the 'Resources' section of the Ontic website (<http://www.ontic.com>).

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2. REVISIONS AND AMENDMENTS

Rev	Date	Reason for change	Revised by
A	19-Oct-2021	Initial issue	Z. Rowe
B	05-Oct-2022	Annual review	Z. Rowe
C	09-Oct-2023	Annual review	Z. Rowe
D	31-Oct-2024	Annual review	Z. Rowe
Next review due October 2025			

3. IMPORTANT INFORMATION AND WHO WE ARE

Ontic is a specialised engineering, manufacturing and procurement business supporting and sustaining primarily aviation products.

When you visit our websites, you purchase goods or services from or sell goods or services to us, you respond to a survey from us, you apply for a role with us or otherwise communicate or engage with us including requesting information or marketing communications your personal data is controlled by **Ontic Engineering & Manufacturing UK Limited** of Cleeve Business Park, Bishops Cleeve, Cheltenham, Gloucestershire, United Kingdom, GL52 8TW ("Ontic" also referred to as "we", "our" and "us").

Ontic is a data controller. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This privacy notice supplements other privacy notices and privacy policies and is not intended to override them.

4. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, image and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** including banking and payment details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage and Profile Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **CV Data** includes your education and employment history and references.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage and Profile Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Except in the case of applicants for roles with us, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences under this data privacy notice.

If You Fail To Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - asking us to supply products or want to supply products to us;
 - apply for a job with us;
 - request marketing to be sent to you;
 - give us feedback or contact us; or
 - if you visit one of our offices or other sites, from the CCTV system managed by us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - a) analytics providers such as Google based inside and/or outside the UK;
 - b) advertising networks based inside and/or outside the UK; and
 - c) search information providers based inside and/or outside the UK.
 - Contact Data and Financial Data from providers of technical and payment services.
 - Identity Data and Contact Data from publicly available sources such as Companies House based inside the UK or other corporate/business registration sources based outside the UK.
 - Identity Data, Contact Data and CV Data from recruitment consultants based inside or outside the UK.

6. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

In general, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or supplier	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (c) Necessary to comply with a legal obligation
To process and deliver your or our order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Usage and Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent or detect fraud or other criminal activity, for health and safety, and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements (including website content) to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage and Profile (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage and Profile	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to your firm	(a) Identity (b) Contact (c) Technical (d) Usage and Profile (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To promote our goods and services	(a) Identity	We will seek your consent to use photos and content for Ontic marketing/promotional materials.
To progress your application for a role with us	(a) Identity (b) Contact (c) CV	(a) Necessary for our legitimate interests (to assess candidates for a role with us) (b) Performance of a contract with you if you are selected for the role

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To conduct vetting	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for safeguarding our business, to prevent or detect fraud or other criminal activity and for health and safety) (b) Necessary to comply with a legal obligation
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The Legal Basis for processing your Personal Data

Notwithstanding the above, depending on the purpose that we hold and process your data for, we will rely on one or more of the following legal grounds to process your data:

a) Legitimate Interests

This means the interest of our business in conducting and managing our business to enable us to continue to be a high quality and reputable supplier or purchaser of goods or services or employer or people. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

b) Necessary for the performance of a contract

This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

c) Necessary for compliance with a legal obligation

This means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

d) Consent

We will ask for your explicit consent to certain proposed processing activity in some circumstances. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular activity at any time by contacting us in writing at any time (email privacy@ontic.com).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional Offers From Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased

goods from us and you have not opted out of receiving that marketing.

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Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us in writing at any time (email privacy@Ontic.com).

Where you opt out of receiving these marketing messages, this means we will no longer send marketing messages to you but this will not affect our use of your personal data for a product/service purchase or other transactions where we need to continue to contact you for the purpose of such transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Ontic website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us in writing at any time (email privacy@Ontic.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes as set out in the table above.

- Internal Third Parties.
- External Third Parties.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who invest in or finance our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We may also in certain circumstances disclose your personal data if required to do so by law or if in good faith we believe this is required to comply with any legal process served on us, to protect our rights or property or to protect the personal safety of individuals.

8. INTERNATIONAL TRANSFERS

We share your personal data within the Ontic Group. This will involve transferring your data outside the UK and/or the EEA.

Many of our External Third Parties, and parts of the Ontic group, are based outside the UK and the EEA (mostly in the United States of America) so their processing of your personal data will involve a transfer of data outside the UK and/or the EEA.

Whenever we transfer your personal data out of the UK and/or the EEA, we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; and
- Where there is not deemed to be an adequate level of protection in the relevant country, we may use specific contracts approved for use in the UK and/or the EEA which give personal data the same protection it has in the UK and/or the EEA.

Please contact us in writing at any time (email Privacy@ontic.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and/or the EEA.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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10. DATA RETENTION

How long will you use my Personal Data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

11. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Note that we may keep minimal personal details to ensure that we do not contact you again, except at your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel

it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above please contact our Data Privacy Lead in writing at any time (email privacy@Ontic.com).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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12. CONTACT DETAILS

If you have any questions about this privacy notice or our privacy practices, please contact our Data Privacy Lead in writing using:

Email: privacy@ontic.com

Post: Cleeve Business Park, Bishops Cleeve, Cheltenham, Gloucestershire, United Kingdom, GL52 8TW

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

13. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy notice under regular review and will be updated periodically. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

14. THIRD-PARTY LINKS

The Ontic website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

If you have any questions about this privacy notice, please contact the data privacy lead – privacy@ontic.com .

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15. DEFINITIONS AND ACRONYMS

CCTV	Closed-Circuit Television
CV	Curriculum Vitae
EEA	The European Economic Area
External third parties	<ul style="list-style-type: none"> • Service providers acting as processors, who may be based or incorporated outside of the UK and/or outside of the EEA, who provide various services to support our business activities such as payment service providers, communication systems providers, IT (Information Technology) service providers, platform solutions and cloud storage service providers. We will ensure that any such service provider adheres to at least the same obligations of security with regard to your information as undertaken by us; • Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers, who may be based or incorporated outside of the UK and/or outside of the EEA, who provide consultancy, banking, legal, insurance and accountancy services. • HM (Her Majesty's) Revenue & Customs, regulators and other authorities acting as processors or controllers, who may be based outside of the UK and/or outside of the EEA, who may require reporting of processing activities in certain circumstances.
ICO	Information Commissioner's Office
Internal third parties	Any subsidiary or holding company from time to time of Ontic Engineering & Manufacturing UK Ltd, and each and any subsidiary from time to time of a holding company of Ontic Engineering & Manufacturing UK Ltd including Ontic Manufacturing and Engineering Inc (incorporated in the United States of America) and Ontic Engineering & Manufacturing Asia Pacific P/L (incorporated in Singapore). Such companies may be based or incorporated outside of the UK and/or outside of the EEA.