

HR AIR LIMITED

**DATA PROCESSING NOTICE FOR CUSTOMERS, SERVICE PROVIDERS, BUSINESS REFERRERS,
INTERMEDIARIES AND USERS OF OUR WEBSI**

What is the purpose of this document?

HR Air Limited (**HRA**) is committed to protecting the privacy and security of your personal information or data ("personal information").

This data processing notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the **Data** Protection (Bailiwick of Guernsey) Law 2017, the Data Protection (Jersey) Law, 2018, and EU General Data Protection regulation 2016/679 and other relevant legislation relating to data protection (all together "the **Data Protection legislation**").

This data processing notice applies to all personal information collected by HRA.

All organisations active in the European Union (EU) will need to comply with the General Data Protection Regulation (GDPR) in addition to local data protection law. This data processing notice is therefore designed to ensure compliance with all relevant Data Protection legislation.

It applies to all clients, service providers, business referrers, intermediaries and users of our website www.hrair.co.uk (**Contacts**).

We are registered with The Jersey Office of the Information Commissioner: www.jerseyoic.org and The Office of the Data Protection Authority. The contact details for The Office of the Data Protection Authority are:

Office of Data Protection Authority
Block A
Lefebvre Court
Lefebvre Street
St Peter Port
Guernsey
GY1 2JP

Email: info@odpa.gg
Website: www.odpa.gg

Our office contact details are as follows:

HR Air Ltd
Airport Cargo Centre
Jersey Airport
St Peter
JERSEY
JE3 7BY

Tel: 01531 744477

HR Air Ltd
Airport Cargo Centre
States Airport
Forest
GUERNSEY
GY8 0DD

Tel: 01481 235273

Email: info@hrair.co.uk

Website: www.hrair.co.uk

Jersey Company Registration: 39095

HRA is a 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 data processing notice.

This data processing notice applies to all contacts whether existing, prospective, declined, exited or former and users of our website. This data processing notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this data processing notice, together with any other data processing 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 data processing notice does not deal with employee or prospective employee personal data. HRair has a separate data processing notice for employees, and ex- employees ("Employee Data Processing Notice") and prospective employees ("Prospective Employees Data Processing Notice") which are available for individuals that fall into these categories. These can be requested by relevant individuals emailing dataprotection@hrair.co.uk.

Data protection principles

We will comply with **Data** Protection legislation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.
7. We are also responsible for being able to demonstrate compliance with the above.

The kind of information we hold about you

Personal data, or personal information, means any information relating to a living identified or identifiable individual. It does not include data where no natural person can be identified from the data.

There are "special categories" of personal data which require a higher level of protection (Special Category Data).

We may collect, store, and use the following categories of personal information about you:

- **Personal** Details:
 - Full name
 - Title
 - Resident address
 - Telephone, fax, email
 - Passport/Photo ID
 - Driving License number
 - Date of birth
- Compliance data:
 - Bank details

There are also "special categories" of personal data which require a higher level of protection (Special Category Data)

- Administration data
 - File notes which may contain personal data / and potentially special category data.

How is your personal information collected?

We collect your personal information when you contact us by telephone, in writing, by email or by entering your details in the fields requested on, or any documents linked to or downloaded from, our website, or any other forms provided to you.

We may collect personal data in the form of CCTV images when you visit our premises.

We may also collect personal data if you apply for a position with us or when you work with us. This data processing notice is available to relevant parties on request from a HRA company director by contacting dataprotection@hrai.co.uk.

We will collect the data to enable us to deal with your enquiry or provide you with the relevant services. If you telephone us we may record the conversation for training, customer service and quality of service purposes. If we intend to record your call you will be informed before the call commences so you are able to hang up. We will record the entire conversation unless credit or debit card details are taken for payment, at which point our phone recording software will temporarily suspend the recording. When you write to or email us, we may store and use the information you provide within that letter or email together with your postal address and email address and any enclosures or attachments you may have included.

We also use cookies and collect IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet). We use analysis software (Google Analytics, Hotjar or equivalent) to look at IP addresses and cookies for the purpose of enhancing your user experience. This data is not used to develop a personal profile of you and the log files are regularly purged. Cookies may be used to customise your experience; record how many times our site is visited, and the pages accessed. You can disallow cookies at any time by amending your web browser settings. If you decline them, some features of our site may not work as well, or you may not be able to access or use some features or services. Please note, it is not our intention to use cookies to retrieve information that is unrelated to our site or your interaction with it.

We may sometimes collect additional information from third parties including clients, client advisers, credit reference agencies or public open sources.

We will collect additional personal information in the course of service-related activities throughout the period of providing services to you.

How we will use information about you

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

1. Where we need to perform the contract, we have entered into with you or another controller who has engaged us as processor to carry out work on their behalf.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

Normally the purposes for which we use your personal information will be made clear at the point we collect that information. We will not use your personal information for purposes that are not clear when it is collected. The personal information you provide us is used primarily to provide and pay for the products and services you request, to manage any account you may have with us and to advise you of any improvements and or changes to those products, services and accounts and to respond to your enquiries, instructions, or claims.

Where we use legitimate interest of process your personal data, these legitimate interest are usually:

- To enhance or improve customers' experience of HRA products and services and our website
- for security purposes i.e. confirm your identity when you use our services
- to develop and provide products and services, either on our own or with third parties
- to effectively manage our business and protect our team

Situations in which we will use your personal information

We need all the categories of information in the list above (see 'The kind of information we hold about you' on page 1, above) primarily to allow us to perform contracts with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- Providing products and services to you either on our own account as a controller or as a processor
- Informing you of the products and services we offer or changes to those products and services
- Administering the contract, we have entered into with you or where you are a party related to an entity for which we are contracted to provide services
- Business management and planning, including accounting and auditing
- Making arrangements for the termination of our commercial relationship
- Education, training and development requirements
- Dealing with legal disputes involving you
- To prevent fraud
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

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

Do we need your consent?

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is

not a condition of your contract with us that you agree to any request for consent from us, but declining consent may affect what services we can offer you.

Our obligations as a controller

Information about criminal convictions

Due to the nature of the work HRA undertakes, we do not envisage that we will hold information about criminal convictions.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes. Sharing your personal Information

We may have to share your data with third parties, including third-party service providers and other entities in the group.

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

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might we share your personal information with third parties?

We will not share or sell your personal data with anyone outside of HRA except as set out below:

- we made it clear to you we may do so when you provided the information
- to third parties we are have contracted or are contracted by to provide the products and services you have requested
- to our auditors or legal advisors
- we are legally required to do so
- with relevant third parties in the event of HRA's sale, merger, consolidation, change in control, reorganisation, liquidation, or administration

Which third-party service providers process your personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers:

- Handling and delivery of freight
- IT Support
- Data Protection support

How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to countries which are authorised jurisdictions other than Member States of the European Union in order to perform our contract with you. Where there is an adequacy decision in force or the authorised jurisdiction is a designated jurisdiction which is (i) the United Kingdom, (ii) a country within the United Kingdom, (iii) any other country within the British Islands, or (iv) any sector within a country mentioned in (i), (ii) or (iii).

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

Data retention

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of which are available from a HRA company director, dataprotection@hrai.co.uk. 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 requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a Contact of the company we will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the:

- **Right to data portability:** right to request the transfer of your personal information to another party.
- **Right of access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Right to object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes or if data were being processed on grounds of public interest or for historical or scientific purposes.
- **Right to rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Right to restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Right to be notified of rectification, erasure and restrictions;** and
- **Right not to be subject to decisions based on automated processing.**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our data protection officer in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our data protection officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection contact point

If you have any questions about this data processing notice or how we handle your personal information, please contact a HRAir company director at dataprotection@hraid.co.uk. You have the right to make a complaint at any time to the Authority established pursuant to the  Guernsey and Jersey Data Protection Laws and to appeal any decisions.

Changes to this data processing notice.

We reserve the right to update this data processing notice. at any time, and we will provide you with a new data processing notice. when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This data processing notice. was last updated on 24 March 2023.

If you have any questions about this data processing notice., please contact a HRA company director as follows:

Email: dataprotection@hrai.co.uk

Data Protection
HR Air Ltd
Airport Cargo Centre
States Airport
Forest
GUERNSEY
GY8 0DD