

SITA EXTERNAL APPLICANT DATA PRIVACY NOTICE

Date: 2022

Scope: Talent Acquisition – Applicants for employment

Introduction

SITA and its group of companies (“SITA”, “our” “us” “we”) is committed to respecting the privacy of individuals and the compliant use of Personal Data in accordance with applicable data protection and privacy laws, regulations and our Code of Conduct.

This Privacy Notice (“Notice”) applies to SITA prospective employees and explains why SITA collects your Personal Information, how it uses it, how it is secured, your rights in relation to your Personal Data, and how to contact us and where applicable, and the relevant supervisory authority should you have any questions or wish to make a complaint regarding our handling of your Personal Data. Any personal data you provide will only be used in accordance with this privacy notice.

In addition to the specific processing information in this Data Privacy Notice, SITA processes personal data in accordance with its SITA Services and Web Privacy Statement located at <https://www.sita.aero/legal/privacy-at-sita/privacy-statements>.

What is personal data

Personal Data is any information that on its own or in conjunction with other information can directly or indirectly identify a living individual. Name, address, phone number, date of birth, email address, marital status, and employment details, are all examples of personal data. In some countries Personal Data is known as “Personally Identifiable Information” or “Personal Information.”

Which personal data do we process for which purposes

SITA processes the following personal data elements to match potential employees with open positions within our organization and for HR management reporting purposes:

- your academic records, employment history, identity, contact details, home address, phone numbers, personal email, qualifications, curriculum vitae/resume, job application details, interview notes, references, salary or wage expectations, pre-employment screening result, national identification number, professional memberships, and full name.

We do not collect personal data revealing racial or ethnic origin, political opinions or philosophical beliefs, trade-union membership, sexual orientation, biometric or health data, except where equal opportunity data (such as disability/ethnicity/veterans’ status) is collected to comply with local laws.

Lawfulness of processing

Our processing of your Personal Data will be based on the following grounds:

a. Performance of a contract

We collect and process your Personal Data for you to make and submit your application for employment with SITA. This is prior to entering into any future employment or assignment contract between you and SITA should you be successful in your application.

b. Legitimate interest

We have a legitimate interest in collecting and processing your Personal Data to perform necessary candidate screening, background checks, standard review of job applications and to comply with applicable non-EU laws in relation to visas/immigration/equal opportunity employment.

c. Legal obligation

We collect and process your Personal Data in order for SITA to comply with applicable visa/immigration/equal opportunity employment laws.

Profiling

We will not use your personal data for decisions based solely on automated processing if the decision produces legal effects concerning you or significantly affects you, unless you gave your explicit consent for this processing.

Employee background checks

To ensure that individuals who join SITA are well qualified and have a strong potential to be productive and successful employees, SITA may investigate the backgrounds and employment references of applicants in certain cases, for given job positions and in particular jurisdictions. Background investigations will be conducted at SITA's discretion and in accordance with the applicable legislation.

To do this SITA relies on the accuracy of the information you provide in your employment application, and any other additional information that you present during the hiring process. Any misrepresentations, falsifications, or material omissions in any of this information or these data may result in an applicant being excluded from further consideration for employment.

Do we share your personal data with third parties

Where we share your personal data with our agents or sub-contractors for the purposes listed above, we ensure that appropriate safeguards are in place to process your personal data in accordance with this privacy statement e.g. EU Model Clauses or Binding Corporate Rules.

In limited cases, SITA may also share personal data with third parties, where both SITA and the third-party act as separate independent data controllers. In such cases, SITA and the third party shall be individually and separately responsible for complying with the obligations that apply to it as a Data Controller under any applicable Data Protection Laws.

We do not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

We may disclose your personal data without your permission to the extent that it is required to do so by European Union or National law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

Security

SITA is committed to ensuring that your personal data is secure. In order to prevent unauthorized access, disclosure or accidental loss, we have put in place appropriate technical and organisational measures to safeguard and secure the personal data we process.

Data retention

14. We will store your personal data in accordance with applicable legislation of the country of employment.

Data subject rights

You may request details of personal data which we hold about you. Please write to SITA at the following link <https://www.sita.aero/copyright-menu/data-subject-rights> in relation to any such request.

Where we share your Personal Data with a third party who acts as a separate independent data controller, the third party will be responsible to reply to your request.

If you believe that any personal data we are holding on you is incorrect or incomplete, please contact us as soon as possible, at the link above. We will correct any personal data found to be incorrect.

You may always choose to object to the collection or use of your personal data whenever data is processed for the legitimate interest of SITA, however SITA may continue to collect or use such data where SITA can demonstrate compelling overriding legitimate grounds for the processing, or for the establishment, exercise, or defence of legal claims.

Further information

If you have any questions about this privacy statement, questions or complaints about the processing of your Personal Data by SITA then please contact privacy@sita.aero.

If you are dissatisfied with SITA's handling of any privacy complaints you have the right to lodge a complaint with your relevant data privacy supervisory authority. The name and contact details of the Data Protection Authorities in the European Union can be found at https://edpb.europa.eu/about-edpb/about-edpb/members_en.

From time to time we may update this Notice in response to changing legal, technical or business developments. When we do, we will publish the changes, as appropriate. Your continued use of our Services and Websites after the effective date of such changes constitutes your acceptance of such changes.

If you have questions about your data rights and how they apply to your Personal Data; or about how we use your Personal Data; or would like to request access to the Personal Data we hold about you, please contact the SITA GLOBAL Privacy Office at privacy@sita.aero.

You can also contact the Chief Privacy Officer, who is the designated Data Protection Officer for the SITA group of companies, with any enquiries that you may have.

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