

Privacy Policy

updated Jul 2022

SA Group and each of its group companies (“We”) are committed to protecting and respecting your privacy, under the General Data Protection Regulation 2016/679 (“GDPR”).

SA Group is composed of the following partner companies: HSM Aero, Cabinair Services, Specialist Aviation, and SATTO Solutions referred to hereby as “SA Group”.

We respect and value the privacy of everyone who visits and places enquiries through each of our group companies’ websites: HSM Aero (www.hsm.aero), Cabinair Services (www.cabinair.aero), Specialist Aviation Spares (www.specialist.aero), SATTO Solutions (www.satto.aero) (“Our Sites”) and will only collect and use personal data in ways that are described here and in a manner that is consistent with Our Obligations and your rights under the law.

Please read the following notice to understand how we will collect and use your information and the rights you have in relation to your information. References in this notice to “your information” and “personal data” are to personal information that you provide to us. This notice was last updated on the above date and may vary from time to time so please check it regularly.

1 Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- “personal data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Sites when filling out our Contact Form, or when you email a SA Group representative directly with an enquiry or the information contained on your business card, when you exchange your contact with us directly, in a business context such as meeting, exhibition/ trade show.
- “We/Us/Our” means Specialist Aviation Holdings Ltd (SA Group), a limited company whose registered address is Aerospace Logistics Centre, Fifth Avenue, Letchworth SG6 2T. SA Group consists of the following companies:
- ▶ **HSM Aero** – Registered Address: Aerospace Manufacturing Centre, Campus 5, Letchworth, Herts, SG6 2JF, UK. Website: www.hsm.aero
 - ▶ **Cabinair Services** – Registered Address: Aerospace Interiors Centre, Blackhorse Road, Letchworth, Herts, SG6 1HB, UK. Website: www.cabinair.aero
 - ▶ **SATTO Solutions** – Registered Address: Aerospace Logistics Centre, 5th Avenue, Letchworth, Herts, SG6 2TS, UK. Website: www.satto.aero
 - ▶ **Specialist Aviation Spares** – Registered Address: Aerospace Logistics Centre, 5th Avenue, Letchworth, Herts, SG6 2TS, UK. Website: www.specialist.aero

2 What Does This Policy Cover?

This Privacy Policy applies to data you provide when using Our Sites, or direct email enquiries/ phone calls to any of SA Group business representatives, or business cards exchanged at business events or business meetings.

Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

3 What Data Do We Collect?

Depending upon your use of Our Site and the information you provide on our Contact Forms on Our Sites, in your direct email enquiries to sales@hsm.aero, sales@sagroup.aero, sales@satto.aero, sales@cabinair.aero, direct email to Our business representatives, phone correspondence with us, business cards exchanged at business events and meetings, We may collect some or all of the following personal data:

- a) name
- b) business/company name
- c) job title
- d) profession
- e) contact information such as email addresses and telephone numbers

4 How Do We Use Your Information?

4.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Act 1998 and General Data Protection Regulation 2016/679 at all times. For more details on security see section 11 below.

4.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because we need to reply to your enquiries, because you have consented to Our use of your personal data (when submitting a Contact Us form on Our Sites), because you have exchanged your business contact details with Us (e.g. exchange of business cards in a business context), because you have opted in for our marketing communication on Our Sites or because it may be under your legitimate interest (as part of the business).

Specifically, We may use your data for the following purposes:

- 4.2.1 Supplying Our products and/or services to you (please note that We require your personal data in order to enter into a contract with you);
- 4.2.2 conduct administrative or operational processes within our business
- 4.2.3 Replying to emails from you;
- 4.2.4 Provide information, products and services that you request, or identify products and services you may be interested in
- 4.2.5 If you are already our customer, we will contact you electronically about things similar to what was previously sold to you
- 4.2.6 Invite you to our exhibitions, events, courses, seminars, networking sessions

4.2.7 If you attended one of our events, seminars or had a meeting with our representatives and have exchanged your business card with us or gave your contact details, we may contact you to follow up, send the information you requested and invite you to any similar future events.

4.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it, please email the sales@ address of the relevant SA Group company.

5 Using your information for Marketing Purposes

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the contact page form on our website or asked directly when we make our first contact.

The type of marketing communication we send is in a form of a direct email. We do not use automated email systems and we do not monitor/ track your behaviour when/after receiving an email.

The type of marketing information we may send is:

- 5.1 Information on upcoming seminars, courses, exhibitions, shows, networking events, invitations to visit us
- 5.2 Updates on the new services and solutions we offer, including any updates on parts and spares we have in stock

We will not send you marketing if you ask us not to. If you have agreed to receive marketing but then later change your mind and no longer wish to receive marketing, please inform us so we can remove you from our distribution lists. You can contact us on the sales@ email address of the relevant SA Group company at any time and ask to be removed from future marketing email communication.

6 How and Where Do We Store Your Data?

- 6.1 We only keep your personal data for as long as We need to in order to use it as described above in section 4 and/or section 5.
- 6.2 Your data will only be stored in the UK, on our secured servers.
- 6.3 Once any personal information comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure

7 How and Why We May Share Your Information

Please note that we may on occasion share your information with our partner companies from the SA Group (HSM Aero, Specialist Aviation Spares, Cabinair Services, SATTO Solutions, 365 Aerospace, WCS Aerospace) and any third parties advertising of complementary services and sometimes marketing (in the manner specified in section 4 and/ or section 5). In some cases, the third parties may require access to some or all of your data.

However, we have taken steps to ensure that all such entities keep your personal information confidential and secure and only use it for the purposes that we have specified and have informed you of. In relation to any other third parties we will only disclose your information where you have given your consent or where we are required to do so by law, or where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.

8 How Can You Control Your Data?

8.1 In addition to your rights under the GDPR or when you submit personal data via Our Sites, direct email enquiry to our sales@sagroup.aero, sales@satto.aero, sales@cabinair.aero, sales@hsm.aero, any of Our business representatives or exchange business cards with us, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by emailing us at itsupport@hsm.aero).

9 Our Site Cookies

We use cookies on our website. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

10 IP addresses

We do not record your IP address, date, time and duration of your visit on Our Sites.

11 Security

We use up-to-date data storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss. All our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality of your information. However, the transmission of information via the internet is not completely secure. Although we will do our best to try and protect your information, we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk.

12 Your rights

12.1. As a data subject, you have the following rights under the GDPR Regulations, which this Policy and Our use of personal data have been designed to uphold:

12.1.1 The right to be informed about Our collection and use of personal data;

12.1.2 The right of access to the personal data We hold about you (see section 3);

12.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

12.1.4 The right to be forgotten – e.g. the right to ask Us to delete any personal data We hold about you (please contact Us using the details in section 14);

12.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

12.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

12.1.7 The right to object to Us using your personal data for particular purposes; and

12.1.8 Rights with respect to automated decision making and profiling.

12.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you.

13 Third Party Processors

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information.

Our appointed data processors include:

- (i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.

14 Contact information

If you have any questions in relation to this notice, please contact us at:

Address: HSM Aero Ltd, Campus 5, Letchworth, Herts, SG6 2JF, UK

Telephone: +44 (0) 1462 688030

Email: itsupport@hsm.aero

If you currently receive marketing information from us which you would prefer not to receive in the future, please email us at itsupport@hsm.aero.

15 Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and People HR and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site or on the other contexts described in section 3, following the alterations. We recommend that you check this page regularly to keep up-to-date.