



Executive Helicopters Privacy Statement

Executive Helicopters fully respects your right to privacy. Executive is committed to ensuring that your privacy is protected and we wish to be transparent on how we process your data. This Statement together with our terms and conditions sets out the basis on which any personal data we collect from and about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This statement is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR)

Who We Are

Executive Helicopters is one of Ireland's leading Helicopter companies, providing a wide range of expertise in all areas of Helicopter services, services including but not limited to private charter, Utility Gas/ESB powerline survey patrols, Aerial Fertilising, Firefighting, Aerial Lifting, Photography and Aerial filming.

Contact Details

If you would like to contact us with any queries or comments in relation to your personal data, please send an email to operations@executive-helicopters.com or send a letter to Executive Helicopters, Rockhill, Woodford, Loughrea, Co. Galway H62 VW62 or call us on 0909749764 and ask to speak to the Data Protection Representative.

Information That We Collect

Executive Helicopters processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services.

We will collect and process the following data about you.

Information you provide us

This is information about you that you give us by corresponding with us by phone, e-mail or otherwise. It includes the information you supply us with when you engage us to provide quotation, flight services etc. The information you provide may include but is not limited to Name, Date of Birth, Weight, Home Address, Personal Email, Business Email, Home Telephone Number, Mobile Telephone Number, Passport Number, Nationality, Payment details, Location maps etc.

You are not obliged to provide us with your personal information. However, if you do not, we may not be able to carry out the services you have requested of us.

How We Use Your Personal Data

We gather and use your information to:

- *For the performance of a contract or to provide a service and to ensure that flights are completed in accordance our contractual obligations to you.*
- *To perform administrative activities in connection with our services*
- *We collect and store your personal data as part of our legal obligation for business accounting and tax purposes*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests*
- *To comply with legal and to professional obligations and to cooperate with regulatory bodies*
- *To monitor and improve the quality of our services*
- *To notify you of changes in our services*
- *To exercise, defend or protect our legal rights or the rights of our clients or third party*
- *To provide you with information about other services we offer that are similar to those you have already requested of us or enquired about;*

Executive will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up-to-date, and not keep it longer than is necessary

The purposes and reasons for processing your personal data are detailed below: -

We must have a legal basis to process our personal information. We process your data in order to comply with legal obligations to which we are subject, to perform the service you have requested of us or to take steps at your request prior to undertaking to provide services for you. In most cases the legal basis will be one of the following:

- For our legitimate interests for example to provide services to our clients, to ensure that the services we provide are appropriate to our customers requirements, to improve our services, manage our risks, maintain accurate records, manage our business in an efficient way and to provide you with information about other services we offer, or
- For the legitimate interests of our clients and other third parties where applicable, or
- To comply with legal and regulatory obligations to which we are subject such as due diligence, customs, aviation and reporting obligations.

Your Rights

At any point while we are in possession of our processing our personal data, you the data subject, have the following rights.

- Right of access – you have the right to request a copy of information we hold about you
- Right to be forgotten: You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us.
- Right to Restriction of processing: where certain conditions apply, to have a right to restrict the processing of your data.

- Right of Portability: Where applicable, you have the right to data portability of your information
- Right to object – you have the right to object to certain types of processing such as direct marketing
- Right to object to automated processing, including profiling and the right to be informed about any automated decision-making we may use.
- Right of rectification: If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Where we process your data solely on the basis of your consent, you are entitled to withdraw your consent at time. This will not affect the lawfulness of our processing before the withdrawal.

Sharing and Disclosing Your Personal Information

We may share your personal information

- with any Executive Helicopters Entity at Rockhill Woodford, Loughrea, Co. Galway.
- To Agents, Contractors, Advisers and business partners for the purpose of fulfilling our contractual obligations, eg to deliver our services and to provide the flight service that you have requested.
- To Third Party service providers such as entities providing customer service, Revenue, solicitors, financial advisors, external auditors and other services.

We may disclose or share your data in order to comply with any legal obligation in order to enforce or apply our terms and conditions

Safeguarding Measures

Executive Helicopters takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction

Unfortunately, the transmission of information by means of internet, including through email, is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to or from us by means of e-mail and any such transmission is at our own risk.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Executive Helicopters however, as this information is required for us to provide you with our services we will not be able to offer some/all our services without it.

Legitimate Interests

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

How Long We Keep Your Data

Executive Helicopters aim is to only retain personal information for as long as is necessary. We Data is retained for as long as required under legal or regulatory obligations and to commence or defend legal claims and for as long as required for legitimate business purposes. Unless otherwise required under applicable law, we will store your data for as long as we provide services to you and for a period of six years after which time it will be destroyed.

Where we store your information

Information may be stored in different places. Physical files are stored in our office and in our archives. Electronic files are stored on our secure computers and potentially in the Cloud. We may transfer data to, and store it at, a destination outside of the EU. Whenever we transfer data in such a way we will ensure appropriate safeguards are in place. You may contact us via e-mail, letter or telephone in case you wish to find out more.

Additional processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information to you prior to processing this data.

Marketing

We may contact you by mail, email and telephone about our services and other events involving or relating to Executive which may be of interest to you. You have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, please send us an email to operations@executive-helicopters.com with a request to unsubscribe.

Lodging A Complaint

Executive Helicopters only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Data Protection commissioner at any time and Executive's Data Protection Representative.

Privacy Policy Statement changes

We may update this privacy statement from time to time and will publish such updated version on our website, as appropriate. Changes will be effective from the point at which they are posted. It is your responsibility to review this policy periodically so you're aware of any changes. By using our services you agree to this privacy policy

This Policy was last revised November 2018