

## Website Privacy Notice

This privacy policy explains how BBAM US LP (“**BBAM**”) collects, uses, shares and otherwise processes your personal information (your “**Personal Data**”) in the context of your access and use of this website (the “**Site**”). This Privacy Notice also describes your choices and rights regarding the use, access and correction or deletion of your Personal Data.

From time to time, we also receive (submitted through our email address [humanresources@bbam.com](mailto:humanresources@bbam.com)) unsolicited applications for roles throughout our organisation. Personal data of such applicants is processed in accordance with this Privacy Notice. Should an applicant then become an employee of one of BBAM’s group companies, the employee privacy notice of that entity will then apply to the personal data concerned.

Notice to EU-resident individuals: this Privacy Notice and its enumerated policies are intended to comply with the General Data Protection Regulation EU 2016/679 (the “**GDPR**”) and provide appropriate protection and care with respect to the treatment of your Personal Data in accordance with the GDPR.

BBAM fully respects your right to privacy and we are committed to ensuring that your Personal Data is:

- Processed lawfully, fairly and transparently
- Processed for specific, explicit and legitimate purposes only, and not in any manner incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date
- Not kept in an identifiable form for longer than is necessary for the purposes for which the personal data are processed
- Processed in a manner that ensures appropriate security of the personal below.

### Summary

To enhance, personalize, and support your experience on the Site, among other things, we collect, use, and share your Personal Data. As detailed below, your Personal Data may also be used by BBAM to provide social media features (eg, features that allow you to share content directly to your preferred social media platform), analyze traffic, and provide similar services and content.

As noted above, personal data contained in unsolicited applications for roles in BBAM is also processed in accordance with this Privacy Notice.

BBAM is committed to your privacy and will not share any Personal Data with any third party without your consent, except as outlined in this Privacy Notice or as permitted by law. If you have any requests, comments, or questions about this Privacy Notice or your Personal Data, please contact us in the manner provided below.

## 1. What is Personal Data?

Any information that identifies you, or could be used to identify you once combined with other information, which is submitted to and/or collected by BBAM.

## 2. Who are we?

We are BBAM, the world's third-largest and longest-standing manager of commercial aircraft, providing over 200 airline customers in more than 50 countries with fleet and financing solutions over the last three decades. In this Privacy Notice, the use of “**we**”, “**us**”, and “**our**” means BBAM, the controller of your Personal Data.

## 3. What Personal Data do we process?

**Section Overview:** We collect your Personal Data when you use the Site. Sometimes you may submit it to us yourself, other times it may be collected automatically. You can manage and change your preferences as outlined below.

### Personal Data Collected

When you use the Site, your Personal Data may be collected, used, and shared in a variety of ways. As detailed below, the type of Personal Data collected may vary based on how it was gathered, but may include, among other things, your name, email address, and other information that you voluntarily submit (eg if you contact us by email through our contact page, you may submit your contact information and professional information), information automatically collected about your usage of the Site (eg, the content that you choose to view).

We collect certain technical data as part of the system logs for this website, for example, your computer's IP address, clickstream data which shows the traffic of visitors around this web site (for example pages accessed), the web browser you use, and your computer's operating system.

## 4. How do we use your Personal Data?

Our primary goal in collecting, using and sharing your Personal Data is to enhance your experience on the Site, support the Site, and improve its features, performance and other elements.

Further, if you submit an application to us for a role with BBAM, your Personal Data may be analysed by BBAM to determine your suitability for any roles vacant within BBAM at that time.

Your Personal Data may be used for the purposes outlined below. We will not use your Personal Data without a valid legal basis to do so. However, we may rely on a number of separate and overlapping legal bases to lawfully process your personal data.

In particular, we use Personal Data for the following purposes to pursue the legitimate interests of BBAM:

- **Providing our website:** We will use your Personal Data to pursue our legitimate interest of providing the Site to users. We collect traffic data to understand how you use our website and analyse how we can improve it.
- **Improving efficiencies:** We will use your Personal Data to pursue our legitimate interests of improving efficiencies in how we operate the Site.
- **Assessment of employment applications:** Where we receive such applications we process the Personal Data in pursuit of our legitimate interests to consider the applications and to respond to individuals.
- **Legal process:** We will use your Personal Data when it is in our legitimate interests or necessary to preserve or defend our rights in court, to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities, which may include lawful access by courts or governmental authorities outside your country of residence.
- **Safety and security:** We will process your Personal Data for safety and security purposes as is necessary to pursue BBAM's legitimate interests of protecting against security risks of all types. Any such processing in this respect would also be in your legitimate interests.

## 5. Do we share your Personal Data?

We keep your Personal Data private. We don't sell your Personal Data. However, in limited circumstances we may share your Personal Data with third parties. These are set out below:

- **With our group companies:** in order to respond to enquiries that you may send to us by email through our website, it may be necessary to share your Personal Data with one or more of our group companies in other jurisdictions, such as BBAM UK Limited, BBAM Aviation Services Switzerland GmbH, SZ Services Puerto Rico LLC, BBAM Singapore Pte. Limited, BBAM Aviation Services Limited or BBAM Japan LLC.
- **With our service providers:** To a limited extent, we may share Personal Data with our service providers where this is necessary to provide our website to you. These service providers will be obliged to keep your Personal Data confidential, safe and secure and only use it on our instruction.
- **For legal and safety reasons:** We may provide Personal Data to a third party if we believe in good faith that it is reasonably necessary for legal reasons; to enforce our terms or agreements; to detect, investigate, prevent, and address fraud and other illegal activity, security or technical issues; or to protect the rights, property or safety of BBAM, our employees, users, or others.

## 6. How long do we keep your Personal Data?

We will keep your Personal Data in accordance with applicable legal requirements, and only for as long as necessary for the purposes described above, or as long as required by law or to defend potential legal claims.

## **7. How do we keep your Personal Data secure?**

We take our security responsibilities seriously and deploy appropriate organisational and technical security measures to keep Personal Data secure. Of course, it's important to keep in mind that no data transmission on the Internet is guaranteed to be completely secure. We review our security policy regularly.

Your Personal Data is stored on BBAM servers located in the United States. We use industry standard physical, electronic, and organizational safeguards to protect your Personal Data against loss or theft as well as unauthorized access and disclosure to protect your privacy. We treat Personal Data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us as provided below.

By choosing to access and use the Site, or to submit an unsolicited application to us for a role in BBAM, you understand that your Personal Data will be transferred to and stored in the United States and that the privacy protections and the rights of authorities to access your Personal Data may not be the same as in your home country.

## **8. Privacy of Children**

This Site is intended for people who are at least 16 years of age. If you are less than 16 years old, please do not send any Personal Data to us - including information such as your name, address, or e-mail address. We do not knowingly collect (nor do we wish to collect) any Personal Data from children under the age of 16. In the event that we learn we have collected any Personal Data from a child under the age of 16, we will delete that information from our database.

## **9. International Transfers**

Your Personal Data may be transferred to other countries in connection with your use of the Site. If you access or use the Site outside of the United States, your Personal Data will be transferred to our servers in the United States.

## **10. What are your rights?**

If you are resident in the EU, you have the right to obtain a copy of your Personal Data in an easily accessible format. In certain circumstances, you also have the right to object to the processing of your Personal Data, to request the amendment or deletion of your Personal Data and to withdraw your consent to the processing of your Personal Data (where we are relying on consent as the legal basis for processing your personal data).

Without prejudice to any other rights you may have, you may file a complaint with your national data protection authority. For a list of national data protection authorities, see [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

If you would like to exercise any of your rights or you have any questions about your rights please email us at [info@bbam.com](mailto:info@bbam.com). Alternatively, you can contact us by telephone or post using the contact details available below.

## 11. Contacting us

If you have any questions regarding this Privacy Notice or our use of your personal data, please contact us using the following information:

Web:	<a href="https://www.bbam.com">https://www.bbam.com</a>
Email:	<a href="mailto:info@bbam.com">info@bbam.com</a>
Telephone:	415 267 1600
	BBAM US LP
	50 California Street
	14 <sup>th</sup> Floor
Postal address	San Francisco
	CA 94111
	USA

## 12. Changes to this Notice

We keep this notice under regular review. If we make any material changes to this Notice, we will notify you by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Last updated December 2018