

## Privacy Policy

*Last Updated: November 8, 2018*

### Global Engine Services Website Privacy Policy

Global Engine Services (“Global Engine Services” or “we” or “us”) is a business unit of BBA Aviation plc, a company registered in England with registered office at 105 Wigmore Street, London, W1U 1QY and registration number 53688. We are comprised of the following legal entities:

|                                     |  |  |
|-------------------------------------|--|--|
| Dallas Airmotive, Inc. (US)         | International Governor Services LLC (US)               | Dallas Airmotive                                     |
| H+S Aviation Limited (England)      | Dallas Airmotive Asia-Pacific Pte. Limited (Singapore) | Manutenção de Motores Aeronauticos (Brazil)          |
| Barrett Turbine Engine Company (US) |  | Dallas Airmotive South Africa Pty Ltd (South Africa) |

Global Engine Services is committed to protecting and respecting your privacy. This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

This privacy policy applies to the website [www.hsaviation.co.uk](http://www.hsaviation.co.uk) and to any websites and online services offered by us or that link to this privacy policy (collective the “Website”). GES is responsible for the processing of your personal data, and also is referred to as a data controller.

This privacy policy is incorporated into our Terms of Use, which also apply when you use our Website. By using the Website and by providing your personal data and other information through the Website, you acknowledge that your personal data will be processed pursuant to the terms of this privacy policy. If you do not agree with the practices described herein, please do not provide us with your personal data or otherwise interact with the Website.

### What personal data do we collect?

Personal data refers to any information relating to an identified or identifiable individual, or as defined under applicable law. In general, you can use our Website without giving us any personal data. However, additional services may be available to you if you provide us with personal data about you. Where you request such services, or choose to contact us through the Website or our social media accounts (e.g. Facebook, Twitter, LinkedIn, YouTube, Instagram), we may collect and process the following information about you:

- Information that you provide directly to us by filling in forms on the Website or contacting us. Such information includes your name, email address, telephone number, company name, and address (including country);
- Your curriculum vitae (CV) or resume and contact details when you apply for a position with us;
- Social media name and profile;
- Location data (for example, a location is derived from your Internet Protocol (IP) address or data such as a zip code or name of a town or city);
- IP address;
- Any other information you voluntarily provide; and
- Information to provide you with further correspondence about our products and services. However, you do not have to respond to these requests and should you choose to receive such details from us, you may withdraw your consent.

## When do we collect personal data about you?

We may ask you to provide certain personal data at various times and places on our Website. In some cases, if you choose not to provide us with the requested personal data, you may not be able to access all of the Website or participate in all of its features.

We may collect personal data from you when you:

- Contact customer service, request a quote or additional information from us regarding our services, or make use of one of our customer support tools;
- Participate in any contests, sweepstakes or other events;
- Sign-up for our e-mail updates and newsletters;
- Connect, link or “share” our Website via social networking sites;
- Provide ratings or reviews of our products and services; or
- Apply for a job with us or our affiliates.

If you supply us with personal data of a third party, you represent that you have provided notice to, and received authorization to provide such information from, that third party.

## What do we do with the information we gather?

Where you choose to provide such information, we and (where we share with third parties, as set out in more detail below) our affiliates collect, retain and otherwise process this information where we have a legal basis to do so, including for the following reasons:

To render services to you or to fulfill a contractual agreement with you when you visit the Website. This includes to:

- Provide you with information, e-mail alerts or notices for products or services that you request from us;
- Determine if you are a suitable candidate for any open positions;
- Send you reminders, updates, support, administrative messages, service bulletins or other requested information; or
- Communicate and provide additional information that may be of interest to you about Global Engine Services at your request.

We use personal data we collect when we have legitimate business reasons to do so, and so long as it is compatible with your rights and expectations of privacy. This includes to:

- Ensure that content from our Website is presented in the most effective manner for you and for your computer;
- Better understand your preferences and to provide you with a better quality of service; and
- Identify your preferences so we can notify you of new or additional products, services, and promotions that might be of interest to you.

Global Engine Services also has legal grounds to use your personal data:

- For fraud prevention, public safety, and enforcement of our corporate reporting obligations and Terms of Use; and
- To comply with the law, regulation, court order, subpoena or other legal process.

If you provided your consent (opt-in) to receive marketing communications from us (and/or our selected third-party affiliates), our representatives may follow up by email, phone, or mail (in accordance with your stated preference(s)) and send you information about new developments or activities which we think may be of interest to you. If you do not want us to use your personal data, for example, to send you newsletters or directly market our products or services, you can opt out as described in the “Your preferences” section below.

## Will we share your personal data with anyone else?

We respect your privacy and do not sell, rent or loan any identifiable information collected on this Website, except as provided in this privacy policy. Any information that you give us will be treated with the utmost care and security.

We may share your personal data as required or permitted by law as follows:

- With any affiliate of GES in the ordinary course of business, who may only use your personal data for the purposes described in this privacy policy;

- With our contractors, suppliers and vendors who provide services for us on our behalf, such as processing and fulfilling orders; data analytics and storage; assistance with direct marketing and distribution of e-mails and other communications; fraud prevention services; and to accomplish the other purposes for collection described above;
- In the event we or any of our affiliates file for bankruptcy, or where there is a transfer of ownership (or assets) in connection with proposed or consummated corporate reorganizations of Global Engine Services, BBA Aviation or any of our affiliates, such as actual or potential mergers, acquisitions, or sales of business units;
- To comply with legal orders and government requests, or as needed to support auditing, compliance, and corporate governance functions;
- To combat fraud or criminal activity, and to protect our rights or those of our affiliates, users, and business partners, or as part of legal proceedings affecting Global Engine Services, include to enforce our Terms of Use;
- In response to a subpoena, court order, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate;
- With your consent.

Access to your personal data is limited by need. Only a restricted number of employees, and individuals and entities with whom we contract to carry out business will have access to your personal data for the purposes described above.

## Data transfers

Your personal data may be transferred to offices operated by BBA Aviation plc group companies, including Global Engine Services, in countries outside the European Economic Area (EEA) or may be processed by our affiliates or third-party service providers based or operating outside the EEA.

We will use appropriate safeguards to ensure that your personal data is treated securely and in accordance the data protection legislation in connection to such transfers or processing of your personal data outside the EEA. For more information on our safeguards, contact us at the details provided below.

## How long do we retain information about you?

Your personal data will be held in our systems for ten years to match the typical overhaul cycle for aircraft engines and manage our relationship with you for newsletters, alerts and service notifications during this period. We carry out periodic data reviews of this information to ensure that it is up to date and accurate. We may also reaffirm your consent to use your personal data. When your personal data is no longer needed, or you request

erasure and there are no other grounds for processing (see “Your preferences” section below), it will be deleted as soon as practicable, but in all cases, in the time permitted by applicable law.

For all other purposes, we will retain information about you for no longer than is necessary in respect of the purpose for which it is collected. For example, if you use the Website to request our support during an AOG event, your personal data may be included in work orders transmitted to our field service technicians, invoices for our services and log book entries and quality records related to the work conducted. We hold these documents, whether electronically or in paper form, in accordance with our retention practices and in compliance with aviation regulatory requirements. Upon expiration of the applicable retention periods, these documents or records are deleted if in electronic form or securely destroyed if in paper form.

## Children

The Website is intended for a general audience and is neither intended for children under the age of 13 nor does it contain content typically of interest to children. Nonetheless, if we learn that we have inadvertently collected personal data from a child under the age of 13, we will promptly delete that data entirely. If you believe we have inadvertently collected such information, please do contact us at the contact details list below.

## How we use cookies and other technologies

### Cookies

We use cookies for certain areas of our Website. A cookie is a piece of text which asks permission to be placed on your computer's hard drive. Once you agree, your browser adds that text in a small file. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. These cookies help us analyze data about web page traffic and improve our Website in order to tailor it to user needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Your continued use of our Website will be treated as consent to the use of these cookies for the purposes described.

We also use the third-party cookies to collect information about how visitors generally use our Website. We use this information to compile reports and to help us improve our Website.

For example, we collect analytics data through Google Analytics – a third-party cookie provided by Google, Inc. (Google) – to help us understand the market for our Website and to develop promotional and marketing campaigns. The information generated by the cookie about your use of the Website will be transmitted to and stored by Google on servers in the

United States. Google will use this information on behalf of us as the operator of the Website for the purpose of evaluating your use of the Website, compiling reports on Website activity for Website operators and providing other services relating to Website activity and internet usage.

In case IP anonymization is activated on the Website, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on EEA. Only in exceptional cases will the whole IP address be first transferred to a Google server in the United States and truncated there. The IP anonymization is active on the Website. The IP address that your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of the Website.

You can opt out from being tracked by Google Analytics with future effect by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: click here: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

### **Cross-tracking devices**

Global Engine Services uses data analytics companies, advertising networks or social media companies, and features offered by Google Analytics services or pixels such as from Facebook and LinkedIn to engage in “cross-device tracking,” which occurs when platforms and advertising technology companies try to connect a user’s activity across smartphones, tablets, desktop computers and other connected devices. The goal of cross-device tracking is to enable companies to link a consumer’s behavior across devices.

### **Social media plug-ins**

Our Website uses what are called social plugins (plugins) from social networks such as Facebook, Twitter, Instagram, and LinkedIn. These plugins are indicated by the social networks’ respective logos. When you access the Website, your browser establishes a direct connection with the servers of these social networks. The plugin content is transferred by the social network directly to your browser, which then integrates it into the Website.

Integration of the plugin allows the social media networks to receive the information that you have loaded onto the corresponding page of Website. If you are logged in with Facebook, for example, it will be able to assign your visit to your account. An exchange of this information already takes place when you visit our Website, regardless of whether you interact with the plugin or not. If you interact with the plugins, the corresponding information is sent directly to Facebook by your browser and saved there. You can find information how the data is used by the social networks, together with your rights and optional settings to protect your privacy on the social networks websites.

If you do not want social networks to gather data about you via our Website, you must log out on the social network domain before visiting the Website. To prevent information being exchanged with the social networks during your visit to our Website, you can opt out of cookies through your browser settings and other tools.

## Security

Your security is a top priority for us. We have put in place appropriate physical, electronic, and administrative procedures to safeguard and secure the personal data we collect to prevent unauthorized access or disclosure of your personal data.

You are responsible for keeping your personal data secure and not sharing it with others.

Unfortunately, the transmission of information online is not completely secure. Although we do our best to protect all information collected through the Website, we cannot completely guarantee the security of your personal data collected and/or transmitted through the Website. Any transmission of information is at your own risk.

## Your preferences

### Emails

You may choose to opt out of receiving commercial e-mails and other materials from us about our products and services by following the instructions contained in any of the e-mails we send or by adjusting your e-mail preferences at this webpage or by emailing us at [turbines@bbaaviation.com](mailto:turbines@bbaaviation.com) to request any changes.

Please note that even if you unsubscribe from commercial e-mail messages, we may still e-mail you *non-commercial* e-mails for lawful purposes including, for example, to manage any account you have with us, respond to your requests, execute agreements with you and manage your transactions on the Website. Please allow us ten (10) business days from when the request was received to complete the removal. You may update your account preferences at any time.

### EU Users and commercial emails

If you are a user based in the EU, we only send you commercial e-mails or other materials when we have obtained your explicit prior consent (i.e., opt in), except where we have obtained your e-mail address in the course of a sale or negotiations for a sale of a product or service and where the commercial e-mails are only marketing similar products or services. You may opt out using the information provided above under Commercial Emails.

### Disabling cookies

Overall, cookies help us provide you with a better Website service, by enabling us to deliver content to you as a registered user and monitor which pages you find useful and which you

do not. We know that people have concerns about cookies, but we believe that the benefit we both gain from their proper use is worthwhile.

Most internet browsers give you the option to reject all cookies, accept all cookies, erase cookies stored on your computer or be notified before a cookie is stored on your computer. If you reject or erase the cookies referred to above, some Website features or services will not function properly or may not be fully available. Please refer to your internet browser instructions if you want to find out more about rejecting or erasing cookies.

### **Social media**

If you connected, linked or shared your use of our Website via your social media profile, you can manage the permissions granted to such third-party social media services by accessing your user settings under your account. You also can remove our access to your social media account or otherwise control what information these third-party social media services share with us at any time by access the privacy settings in your social media account.

### **Your rights**

You have the following rights in connection with your personal data processed by Global Engine Services:

**Access** – you can request access to your personal data and further details about how your personal data is handled by Global Engine Services;

**Rectification** – you can request rectification of any incorrect personal data held about you;

**Erasure** – you can request erasure of any personal data under certain circumstances (e.g., where there are no overriding legitimate interests pursued by Global Engine Services or by a third party);

**Consent** – where data processing is based on your consent, you can request to withdraw your consent at any time.

If you have a complaint about our processing of your personal data (including how we respond to any requests made about it, as described above), you have the right to complain to the supervisory authority.

### **California Residents**

**Do Not Track** – Currently, Global Engine Services does not track its customers over time and across third party websites to provide targeted advertising, and therefore does not respond to Do-Not-Track (DNT) signals.

## Changes to our Privacy Policy

Global Engine Services reserves the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy. Changes will be indicated by the “Last Updated” legend indicated above.

## How to contact us

If you are concerned or have questions about how Global Engine Services handles your personal data or to exercise any of these rights at any time please contact us at [privacyoffice@bbaaviation.com](mailto:privacyoffice@bbaaviation.com) and we will do our best to assist you within a reasonable period of time and in accordance with applicable law.