



**POLICY PURPOSE**

L3 is committed to ensuring that it complies with legislative requirements and its responsibilities in this regard.

**APPLICABILITY / SCOPE**

This policy applies to; customers, suppliers and other 3<sup>rd</sup> parties.

**PROCEDURES**

As outlined in the attached guidelines.

**ADMINISTRATIVE RESPONSIBILITY**

The responsibility for the update of this policy lies with the Human Resources Department.

**IMPORTANT NOTICE:** The Company reserves the right to amend, modify, suspend, or make certain exceptions to this policy at any time, at the discretion of the Human Resources Department. A paper or electronic copy of this document may not be the document or revision currently in effect. The current version is always the version in the dedicated HR Policies Folder on the L3 MacdonalD Humfrey Automation Network.

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the Organisation and will provide for successful business operations.

This 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. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK data protection laws, the data controller is L3 MacDonald Humfrey Automation Ltd, 29-35 Bolton Road, Luton, Beds, LU1 HY.

## 1. Data protection principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal data must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

## 2. Information you give to us

You may give us information (such as your name, address, email address, phone number, employment history, education, personal interests, signature, by:

- filling in forms on our website,


May 2018

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

- sending us your CV,
- participating in discussion boards or other social media functions on our website,
- giving us your business card, or
- corresponding with us by phone, email, letters or otherwise.

We may use the information you give to us for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

<b>Purposes for which we will use the information you give to us</b>	<b>Legal basis</b>
To register you as a new customer, supplier or other party with whom we enter into a contract	It will be necessary in order to take steps at your request prior to entering into a contract between you and us.
To register your interest in working for our Company	It will be necessary for our legitimate business interests, namely to allow us to consider and process your application for a position in our Company
To process your instructions and provide goods and services to you	It will be necessary for the performance of the contract between you and us
In cases where you are acting as a representative of a company or organization, we may process your information in the course of communicating with that company or organisation, and providing goods and services to that company or organisation	It will be necessary for our legitimate business interests, namely with a view to performing our contractual obligations
In cases where you have supplied your contact information to us with an expectation that we may contact you, we may do so in the course of communicating with your company or organisation with a view to providing goods and services to that company or organization	It will be necessary for our legitimate business interests

<b>L3 MacDonald Humfrey Automation</b>		 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>		
To communicate with you via telephone, email or letter or otherwise	It will be necessary for our legitimate business interests, namely to conduct day-to-day business communications with you as a representative of your company or organisation.	

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

It is also a contractual requirement for you to provide us with certain information. If you do not provide us with that information, we may not be able to continue to provide goods and services to you, or the company or organization you represent.

All other information you give us is given entirely as your discretion. If you do not provide that information, then we may not be able to make contact with you in order to discuss legitimate business interests.


### **3. Information we collect about you from other sources**

When you visit our website, we may collect information about you such as; the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

When you visit our premises, we may collect information about you such as; CCTV footage through our security cameras in and around our building, your name, the company or organisation that you represent, and your vehicle registration information.

We may also collect information about you by conducting searches of public records (e.g. Companies House, electoral roll, DVLA database), or in the process of confirming your identity via our online ID verification provider.

We may use the information we collect about you for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

<b>L3 MacDonald Humfrey Automation</b>		 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>		
<b>Purposes for which we will process the information</b>	<b>Legal basis for the processing</b>	
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website.	
To obtain further information about you, any organisation you represent, with a view to us entering into a contract with you or the organisation you represent	It will be necessary for our legitimate business interests to ensure we are fully aware of all issues relating to the matter that is the subject of the legal services you have requested from us.	
To maintain a secure and safe working environment	In some instances, it will be necessary in order for us to comply with the legal obligations placed on us under UK employment and/or health and safety law. Where that is not the case, it will be necessary for our legitimate business interests to ensure that we have a safe environment for our staff to work in	
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for goods and services we have provided	

You can change the settings on your internet browser to restrict the amount of information that we can collect when you visit our website. If you do not allow us to collect this information, then we may be unable to offer you the best experience possible when accessing and using our website.

#### 4. 'Special category' data

During the course of dealing with you, we may collect information about you relating to your criminal convictions, or certain types of genetic or biometric data (such information is known as 'special category' data).

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

This is most likely to occur, for example, if during the course of your duties as a supplier of products or services to us, you are required to work unsupervised in a restricted area at an airport or other similar environment within the aviation industry.

We will use any 'special category' data that we collect about you:

- provided we have your explicit consent to use it, or
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent, or
- where you have previously made that data public knowledge, or
- where it is necessary for reasons of substantial public interest (for example, detecting or preventing crime), or;
- where it is necessary to protect the public from improper conduct, incompetence, mismanagement or failures in service, or;
- we need to use that data to establish, exercise or defend legal claims.

## 5. Disclosure of your information

You agree that we have the right to share your personal information with:

- our customers in the aviation industry and civil aviation authority
- HM Revenue & Customs, the Information Commissioner's Office and any other regulatory bodies which govern any part of our business;
- our professional advisers (including solicitors, bankers and auditors);
- our auditors and quality assurance assessors;
- selected third parties including; business partners, customers, suppliers and sub-contractors to the extent we reasonably consider that it is in your best interests for us to do so, or it is necessary for our legitimate business interests, analytics and search engine providers that assist us in the improvement and optimisation of our site

May 2018

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

We will disclose your personal information to third parties:

- in the event that we enter into negotiations to sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if L3 MacDonald Humfrey Automation Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about you will be one of the assets transferred to the third party; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract between you or us, or our website terms of use, or to protect the rights, property, or safety of L3 MacDonald Humfrey Automation Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 6. Identifying you as a customer

If you are a business client, we may identify you as a client of the firm in our marketing material or in legal directories, although we will never publicly disclose any confidential information about your legal matters without having obtained your prior consent. If you do not agree to us identifying you as a customer of the firm, please notify us in writing to the address detailed at the top of this policy, or by emailed us at [privacy.mha@l3t.com](mailto:privacy.mha@l3t.com)

## 7. Where we store your personal data

All information you provide to us is stored on our secure internal network folders on servers in the United Kingdom or the United States.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Entry controls.** Our buildings have restricted access with security controls on multiple points throughout each building
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Equipment.** Our internal policies require that individual monitors do not show confidential information to passers-by and that users lock or log-off from their computer when it is unattended.

May 2018

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

- **Transferring data to the United States.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

Some of the data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom. It may also be processed by personnel operating outside the United Kingdom who work for us, our group companies or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

You may request the indication of the countries to which the personal information is transferred as well as the specific privacy measures adopted by L3 Macdonald Humfrey Automation Ltd.


Unfortunately, the transmission of information via the internet 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 our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 8. How long we will store your personal data

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

<b>Legal basis</b>	<b>Length of time</b>
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data



<b>L3 MacDonald Humfrey Automation</b>		 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>		
	overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)	
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop	

## 9. Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information we hold about you** free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information we hold about you** that is inaccurate or incomplete.
- You have the **right to ask us to erase the information we hold about you** (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information we hold about you** to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.

May 2018

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent at any time**.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact us by writing to the address detailed at the top of this policy, or by emailing us at [privacy.mha@l3t.com](mailto:privacy.mha@l3t.com)

You also have the **right to lodge a complaint with the Information Commissioner's Office** if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

## 10. Automated decision-making

We do not use automated decision-making processes.

## 11. Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by post, email or via social media. Please check our website frequently to see any updates or changes to our policy.

## 12. Cookie Policy

We take your privacy and experience of our website and services seriously.

Our website provides information about our company, products and services. We want to make your experience easy, safe and reliable. All over the internet, websites sometimes place small amounts of information on your computer to help tailor your experience. These include small files known as cookies. They cannot be used to identify you personally, nor can they retrieve information outside of the realm in which they are set.

These cookies are used to make our website easier to use, for example;

May 2018

<b>L3 MacDonald Humfrey Automation</b>	 <hr/> <b>MacDonald Humfrey Automation</b>
<b>EXTERNAL DATA STATEMENT, PRIVACY &amp; COOKIES POLICY</b>	

to gauge interest in our services and information about our company

using the information gathered to identify how users navigate the site so that the site's structure can be improved to provide popular information more quickly

If you wish to restrict or block the cookies which are set by our website, or any other website, you can do this through your browser settings. Please be aware that restricting cookies may impact the functionality of most websites.

EU legislation requires all websites to declare the use of cookies on their website. Our website uses several cookies for tracking purposes:

- **Google Analytics.** The Google Analytics cookies are used to help Google track usage of our website. We use this analytics information to compile data on key pages, key words in search terms and to gain a better understanding of the usage of our website. This cookie does not collect any personal information. Google Analytics Privacy Policy. You can choose to opt out of Google Analytics.
- **Webnetism\_cookie.** This cookie is left on your computer when you dismiss the cookie alert we show on our website. This allows us to ensure you are not reminded about cookies when you next visit our website.
- **ASP.NET\_SessionId.** General purpose cookie, could be used for anything. Microsoft's explanation of this cookie

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

### 13. Contact

Questions, comments and requests regarding this policy are welcomed. To do so, write to the address detailed at the top of this policy, or by emailing us at [privacy.mha@l3t.com](mailto:privacy.mha@l3t.com)