

MARTIN-BAKER AIRCRAFT COMPANY LIMITED

Privacy Notice

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KEY SUMMARY

This Privacy Notice is relevant for:

- Users of our website who submit general enquiries;**
- Ejection Tie Club members; and**
- Individual purchasers of our goods**

We only process your personal information for the following purposes in relation to the type of user you are: respond to general enquiries sent to Martin-Baker, manage the Martin-Baker Ejection Tie Club and administer purchase of Martin-Baker products.

This notice explains what data we process, why, how it is legal and your rights.

ABOUT US AND THIS NOTICE



This Privacy Notice is provided by MARTIN-BAKER AIRCRAFT COMPANY LIMITED ("**Martin-Baker**" or "**we**" or "**us**") at Lower Road, Higher Denham, Uxbridge, Middlesex, UB9 5AJ who is a '**controller**' for the purposes of the General Data Protection Regulation (EU) 2016/679. We are responsible for, and control the **processing** of, your **personal data**. This Privacy Notice applies to the **personal data** we collect in relation to the following services and processes: general enquiries sent to Martin-Baker, the Martin-Baker Ejection Tie Club (defined below) and purchase of Martin-Baker products.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our **processing** and your rights.

How to contact us

If you would like this Privacy Notice in another format (for example: audio, large print, braille) please contact us at the details below.

- **Contact:** Head of Information Management
- **Address:** Lower Road, Higher Denham, Nr Uxbridge, Middlesex. UB9 5AJ
- **Telephone number:** 01895 832214
- **Email:** privacy@martin-baker.co.uk

Changes to this Privacy Notice

The latest version of the Privacy Notice can be found at <http://martin-baker.com/>

We may change this Privacy Notice from time to time. The latest version will be available on the website.

Current version: v1 May 2018.

USEFUL WORDS AND PHRASES



Please familiarise yourself with the following words and phrases (used in **bold**) as they have particular meanings in the **Data Protection Laws** and are used throughout this Privacy Notice:

Term	Definition
controller	This means any person who determines the purposes for which, and the manner in which, any personal data is processed.
criminal offence data	This means any information relating to criminal convictions and offences committed or allegedly committed.
Data Protection Laws	This means the laws which govern the handling of personal data . This includes the General Data Protection Regulation (EU) 2016/679 and any other national laws implementing that Regulation or related to data protection.
data subject	This means the person to whom the personal data relates.
ICO	This means the UK Information Commissioner's Office which is responsible for implementing, overseeing and enforcing the Data Protection Laws .
personal data	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs and voice recordings. It will also include expressions of opinion and indications of intentions about data subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>
processing	<p>This covers virtually anything anyone can do with personal data, including:</p> <ul style="list-style-type: none"> • obtaining, recording, retrieving, consulting or holding it; • organising, adapting or altering it; • disclosing, disseminating or otherwise making it available; and • aligning, blocking, erasing or destroying it.

Term	Definition
processor	This means any person who processes the personal data on behalf of the controller .
special categories of data	<p>This means any information relating to:</p> <ul style="list-style-type: none"> • racial or ethnic origin; • political opinions; • religious beliefs or beliefs of a similar nature; • trade union membership; • physical or mental health or condition; • sexual life; or • genetic data or biometric data for the purpose of uniquely identifying you.

WHAT INFORMATION DO WE COLLECT?



We process specific categories of **personal data** for each service/process as explained below.

Personal information provided by you

➤ General enquiries to Martin-Baker

We always welcome customers to contact us for information on our products.

Personal data	Special categories of data/Criminal offence data
<ul style="list-style-type: none">• Name• Contact details (address, phone number, email address)• Details of the enquiry	<ul style="list-style-type: none">• We do not actively request for special categories or criminal offence data. However, we may come across them if you provide them to us.

➤ Martin-Baker Ejection Tie Club

The Martin-Baker Ejection Tie Club is a club managed by Martin-Baker for all pilots who have emergency ejected from an aircraft using a Martin-Baker ejection seat. For more general information about the Ejection Tie Club please visit: <http://martin-baker.com/ejection-tie-club/>.

Personal data	Special categories of data/Criminal offence data
<ul style="list-style-type: none">• Name• Contact details (address, phone number, email address)• Information regarding your emergency ejection (time, location, aircraft type, etc)• Photographs and testimonials	<ul style="list-style-type: none">• Whether or not you sustained an injury when you ejected

➤ Purchase of Martin-Baker products

Personal data	Special categories of data/Criminal offence data
<ul style="list-style-type: none">• Name• Contact details (postal address, phone number, email address)• Payment information (bank account details to execute the transaction)• Information on product purchased	<ul style="list-style-type: none">• We do not collect any special categories of data about you

Personal information provided by third parties

We do not receive any **personal data** about you from third parties.

WHY DO WE PROCESS YOUR PERSONAL DATA?



We use your **personal data** for the following purposes listed in this section. We are allowed to do so on certain legal bases (see section [“How is processing your data lawful”](#) for further detail).

Purpose	Explanation
General enquiries	To assist and respond to your enquiries about Martin-Baker and our business.
Martin-Baker Ejection Tie Club	To administer your Ejection Tie Club membership, contact you about member events and publicise Martin-Baker's products and experience.
Purchase of Martin-Baker products	To assist and administer your purchase of our products.

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?



We are allowed to process your **personal data** and **special categories of data** on the following legal bases:

General enquiries to Martin-Baker

➤ Legitimate Interests

In this case, Martin-Baker's legitimate interest is to provide information about Martin-Baker to prospective customers and to develop new business or grow existing relationships. We only use data that you provide and only use your data in order to respond to your query

Martin-Baker Ejection Tie Club

➤ Legitimate Interests

In this case, Martin-Baker's legitimate interests are:

- To learn from the ejection experiences of individuals who have ejected from products made by Martin-Baker in order to develop and improve our products. Our aim is to improve the experience of ejectees and the performance of our products; and
- To keep in touch with you as a member of the Tie Club, to invite you to events, make you aware of developments in our products that might interest you, to ask for testimonials and otherwise to manage the Tie Club. You can always select not to be contacted by us for this purpose by contacting us using the details in the "[How to contact us](#)" section above.

For special categories of data, we can process your medical information on the grounds of scientific research to enable us to make improvements to our products and improve their safety features for future ejectees.

Purchase of Martin-Baker Products

➤ Contract

It is necessary for our performance of the contract you have agreed to enter with us to buy our products. If you do not provide your **personal data** to us, we will not be able to carry out our obligations under the terms of the contract.

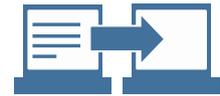
➤ Legal claims

We need to process your **personal data** to defend or establish a legal claim (for example, claims relating to the sale of our products under contract law).

What does 'legitimate interests' mean?

We are permitted to process your **personal data** if it is based on our 'legitimate interests' i.e. we have good, sensible, practical reasons for **processing** your **personal data** which is in the interest of Martin-Baker. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to any of the **processing** that we carry out on the grounds of legitimate interests (see the section "[Your Rights](#)" to find out how).

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?



We do not use any service providers that act as our **processors** for the **processing** set out in this Privacy Notice and your information is not sent out of the European Economic Area.

How we keep your personal data secure

We strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of **processing**. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

If you have any particular concerns about your information, please contact us (see section "[How to contact us?](#)" to find out how).

WHEN WILL WE DELETE YOUR DATA?



We will retain your personal data and special categories of data in relation to the services for the period provided below.

<u>Personal data/Special categories of data</u>	<u>Retention period</u>
Details of your enquiries and our response	One year after enquiry completed
Martin-Baker Ejection Tie Club membership details including information regarding your emergency ejection	Indefinitely for research and development purposes
Transaction details for your purchase of our products	One year after enquiry completed
Bank account information in relation to purchase of our products	One year after transaction completed

YOUR RIGHTS



As a **data subject**, you have the following rights under the **Data Protection Laws**:

- the right to object to **processing** of your personal data;
- the right of access to personal data relating to you;
- the right to correct any mistakes in your information;
- rights in relation to automated decision making (note this does not apply);
- the right to prevent your personal data being processed;
- the right to have your personal data ported to another **controller**; and
- the right to erasure.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about the use of your personal data by us, please contact us (please refer to section "How to contact us").

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the **Data Protection Laws**.

Your Rights Explained

➤ Right to object to **processing** of your personal data

You may object to us **processing** your personal data where we rely on a legitimate interest as our legal grounds for **processing**.

If you object to us **processing** your personal data we must demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed "[How is processing your personal data lawful](#)".

➤ Right to access personal data relating to you

You may ask to see what personal data we hold about you and be provided with:

- a copy of the **personal data**;
- details of the purpose for which it is being or is to be processed;
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which it is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and

- whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

➤ Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please let us know the information that is incorrect and what it should be replaced with.

➤ Rights in relation to automated decision making (note not relevant)

We do not make any automated decisions about you so this right does not apply.

➤ Right to restrict **processing of personal data**

You may request that we stop **processing** your **personal data** temporarily if:

- you do not think that your data is accurate. We will start **processing** again once we have checked whether or not it is accurate;
- the **processing** is unlawful but you do not want us to erase your data;
- we no longer need the **personal data** for our **processing**, but you need the data to establish, exercise or defend legal claims; or
- you have objected to **processing** because you believe that your interests should override our legitimate interests.

➤ Right to have your **personal data** ported (data portability)

You may ask for an electronic copy of your **personal data** which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

➤ Right to erasure

You can ask us to erase your **personal data** where:

- you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;

- you object to our **processing** and we do not have any legitimate interests that mean we can continue to process your data; or
- your data has been processed unlawfully or have not been erased when it should have been.

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the **Data Protection Laws**.

Complaints to the regulator

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have **processed** your data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the **ICO**. Information about how to do this is available on the website at www.ico.org.uk.