

## DATA PROTECTION POLICY

ALLIED AERO SERVICES SWEDEN AB

Allied Aero Services Sweden AB (hereinafter – Allied Aero), Malmö Airport is committed to respecting your privacy and protecting your personal data. This data protection policy (hereinafter – Policy) is effective from 1st of October 2022 (hereinafter – Effective Date).

All personal data is obtained, held, and processed by Allied Aero, in compliance with Policy, any and all data protection related laws and regulations that are applicable to Allied Aero (including without limitation, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, the applicable national data protection law in Sweden and any data protection related terms in any agreement, or contact in force, between Allied Aero and its customers in relation to the supply by Allied Aero of services and/or products.

### Definitions

GDPR General Data Protection Regulation	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
Personal data	Any information relating to and identified or identifiable data subject as defined by applicable law.
Data Subject	An identified or identifiable natural person.
Customer	Natural or legal person who provides Allied Aero with Personal Data.
Data Protection Laws	With relation to Personal Data means GDPR and any other applicable data protection laws.
Controller/Processor	As defined in GDPR.
Personal Data Breach	As defined in GDPR.
Data Processing (Process, Processing)	Any operation or set of operations, which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Services	Any action performed by Allied Aero to provide the services for the aircraft in accordance with the contracts signed between the Customer and Allied Aero, or Customer's documented instructions, requests, specifications, descriptions, agreements.
Responsible Person	Responsible for Personal data protection in Allied Aero : Mr. Helmut Gross (helmut@mtsaviation.se)
Register of Systems	Register of all systems or contexts in which Personal Data is processed by Allied Aero .

## Data Protection Principles

Allied Aero is committed to Processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that Personal Data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial 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; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes of which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organization measures required by GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

## General Provisions

This Policy applies to all Personal Data processed by Allied Aero .

The Responsible Person shall take responsibility for the Allied Aero 's ongoing compliance with this policy.

Any Personal Data provided will only be used in accordance with this Policy. This Policy applies to Personal Data that we collect, use and otherwise Process in connection with Allied Aero relationship with the Customer, (as a client or potential client, use of Allied Aero , use of Allied Aero 's website or mobile apps) booking the Services through third parties (such as agents, brokers and other carriers).

This Policy applies to Allied Aero Customer whether Allied Aero are provided on a casual basis or the Customer entered into a contract with Allied Aero . Allied Aero Services acquired by the Customer, from Allied Aero will be subject to their own terms and conditions. In the event of any conflict between this Policy and the terms and conditions of any such Services, then the terms and conditions of those Services shall prevail.

## Changes to the Policy

This Policy is effective as of the Effective Date. Last Revised Date appearing at the bottom of this Policy to determine when this Policy was last updated. Any changes or modifications will become effective with the Last Revised Date. Any changes to this Policy will be made as required. If the Policy has been changed in any way, then the latest revision of this Policy will be published on Allied Aero 's website. Customer is encouraged to check whether any changes have been made to the Policy from time to time.

Customer's access to or use of any of Allied Aero Services is entirely voluntary. Customer's use of Services constitutes Customer's acceptance of all of the terms and practices described in this Policy, including without limitation, the collection, use, processing, and disclosure of Personal Data as described in this Policy.

**Allied Aero services should not be used by the Customer, if the Customer disagrees with any part of this Policy.**

Any questions or concerns about this Policy or its implementation can be addressed contacting Allied Aero at [osmond@alliedaero.se](mailto:osmond@alliedaero.se)

## **News, publications and events**

Allied Aero shall use the information provided by the Customer to send the news about the latest developments (news, events etc.) at the company, the scope of services that can be provided to the Customer. Personal Data will be used for this purpose until Allied Aero shall be informed that Customer no longer wishes to receive such information from us.

## **Lawful, Fair and Transparent Processing**

To ensure its Processing of Personal Data is lawful, fair and transparent, Allied Aero shall maintain a Register of Systems.

The Register of Systems shall be reviewed at least annually. Allied Aero shall process Personal Data on the basis of:

- Customer's consent;
- Legal agreement between Allied Aero and the Customer, that establishes a basis for data processing;
- Legal obligations to which Allied Aero is subject; and / or

The processing of Personal Data is limited to the scope of purpose for which the data was collected. Access to Personal Data will be restricted to personnel who are required to process the Personal Data to fulfil their professional responsibilities and their duties to you as the Customer. Personal Data is not stored or processed longer than is necessary with respect to the data processing purposes that are listed above.

Allied Aero has taken the appropriate technical and organizational measures to ensure the secure processing of Personal Data. Personal Data will be processed in such a manner to ensure confidentiality and data integrity.

## **Data Minimization**

Allied Aero shall ensure that Personal Data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### *Archiving / removal of Personal Data*

To ensure that Personal Data is kept for no longer than necessary, Allied Aero shall put in place an archiving policy for each area in which Personal Data is Processed and review this Process annually.

The archiving policy shall consider what Personal Data should/must be trained, for how long, and why.

## **Allied Aero Obligations**

With respect to the Services, Allied Aero is the Processor of Personal Data and the Customer is the Controller of Personal Data.

Allied Aero shall Process the Personal Data to perform the Services in accordance with Customer's documented instructions, agreements, specifications, descriptions.

Allied Aero shall maintain the confidentiality of any such Personal Data and shall take reasonable steps to ensure the reliability of any employee, agent or contractor who may have access to the Personal Data, ensuring in each case that access is limited only to those individuals who need to access the relevant Personal Data for the purposes necessary to perform the Services.

To the extent that Allied Aero experiences a Personal data Breach with respect to the Personal Data that Allied Aero Processes as part of its performance of the Services, Allied Aero will notify Customer promptly upon becoming aware of such Personal Data Breach.

Allied Aero will provide all reasonable assistance to Customer with regards to any issues related to data protection to the required by applicable law. After the end of the provision of Services, Allied Aero delete all copies of Personal Data Processed by Allied Aero in accordance with Allied Aero company procedures on data protection.

Upon prior written notice by the Customer, Allied Aero shall make available to the Customer all information necessary to demonstrate compliance with the term set forth in this Policy.

## **Customer Responsibilities**

In performing the Service on behalf of the Customer Allied Aero is relying on the following information to be true and accurate:

- The Customer is the Controller and Allied Aero is the Processor acting on the Customer's behalf;
- The Customer shall comply with the applicable laws and regulations related to data protection and confidentiality;
- The Customer shall be responsible for obtaining the consent of the Data Subject for the Processing of the Personal Data;

To the extent applicable the Customer shall be responsible for notifying or otherwise gaining approval of any regulatory body to the data transfer arrangements.

## **Location of the Processing of Personal Data.**

Allied Aero primarily stores and Process Personal Data within the European Union. Nerveless, it may at times be necessary, that Personal Data is transferred to and stored at a destination outside the European Union. It may also be processed by data processors operating outside the EU.

By submitting Personal Data to Allied Aero or by consenting to the processing of Personal Data, the Customer agrees to the processing of Personal Data, including both data storage and data transfer, outside EU for the purposes set out in this Policy. Allied Aero shall take all reasonably necessary precautions to ensure, that transferred Personal Data is treated securely and in accordance whit the applicable Data Protection Laws.

## Transfer of Personal Data to Third Parties

Due to the nature of Allied Aero provided Service Personal data may be transferred to third parties, including to other countries that may not have the same data protection laws as the country where Personal Data was originally collected. Such transfer of Personal Data to third countries is necessary for the performance of contractual Services between the Customer and Allied Aero . Therefore, the transfer of Personal Data is hereby legitimized on the basis that such transfer is necessary for the performance of a contract between Customer and Allied Aero . These third-party services providers are to be considered as Data Processors.

To the extent applicable it may be necessary for Allied Aero in fulfilment of the Services to transfer Personal Data to a third party agency or authority (including, but not limited to: various governmental agencies, airport authorities, customs official etc.) (hereinafter “Authorities”), which may be located outside of the EEA. To the extent that Authorities make independent decisions in Processing of Personal Data, Authorities act as independent Controller, and Allied Aero shall not to be liable of the Processing of Personal Data by the Authorities.

The Personal Data that will be transferred will be limited to the minimum that is required, to ensure the provision Services.

## Access, Review, Transfer and Deletion of Personal Data

Allied Aero shall make Personal Data available to the Customer for review, pursuant to a request form from the Customer. The Customer, among other rights, has the right to request from Allied Aero erasure of Personal Data or restriction of processing.

## Applicable Law

Any dispute arising from or related to the acceptance, interpretation or observance of this Policy shall be submitted to the exclusive jurisdiction of the competent Court of Sweden, which shall apply the laws of Sweden.

Last Revised Date:	
20221001	O. Karim