

1 Preamble

Responsible for the processing of the personal data described below is:

Pilatus Aircraft Ltd
Pilatusstrasse 1
CH-6370 Stans
E-mail: dataprotection.ch@pilatus-aircraft.com
(hereafter Pilatus)

2 Initial situation

In order to protect employees and in particular employee data, Pilatus has created this HR Data Protection Notice, which sets out, the requirements, purposes, rights and principles of processing and storing of employee data.

3 Your rights

3.1 Data portability

You have the right to receive a copy of your personal data in a standard electronic format, provided that we process the data automatically and that the data is processed with your consent or in direct connection with the conclusion or performance of a contract between us.

3.2 Information about the processing of your personal data

You have the right to be informed whether Pilatus is processing your personal data and you have the right to receive the following information if your data is being processed:

- The processed personal data as such;
- The purpose of processing;
- The period of storage of the personal data or, if this is not possible, the criteria used to determine such period;
- The available information about the origin of the personal data, to the extent that it was not collected from you;
- Where applicable, the existence of an automated individual decision and the logic on which the decision is based;
- If applicable, the recipients or categories of recipients to whom personal data are disclosed;
- States in which your personal data is transferred.

Your rights under 3.1 and 3.2 may be restricted in individual cases due to prevailing interests of third parties or a formal law. Unfounded (i.e. purposes contrary to data protection or obviously of a frivolous nature) requests may be refused. In addition, further restrictions may exist in the case of an prevailing interests of Pilatus and Pilatus does not disclose the personal data to a third parties.

3.3 Revocation of your consent

If we process your personal data on the basis of your consent, you have the right to revoke your consent at any time. This does not affect the lawfulness of the processing prior to the revocation.

4 Description of the processing of your personal data

Data source	Data	General purposes
<p>Application documents and application communication, including all accompanying documents and data, as well as the data in the general application profile (Success Factors).</p>	<p>All information provided in the application in the resume, cover letter or other documents as well as in further communication. In addition, all information provided in the Success Factors application profile in the case of a direct job application as well as in the case of selection for inclusion in the candidate pool.</p> <p>Personal information and identification data such as name, personal and business address, personal and business telephone number, personal and business email address or other contact information, date and country of birth, and place of birth.</p> <p>Personal data related to family and social circumstances such as gender, age and marital status.</p> <p>Personal data such as country of residence, nationalities, photograph, work and residence permits, immigration status, and information on residence status, current salary or desired salary.</p> <p>Qualifications and certifications, including current and previous positions, education and training courses, resume, records of education and work accomplishments, in some cases: Contact details of reference persons and results of suitability assessments and interview evaluations/feedbacks.</p>	<p>Assessment of the suitability of an applicant for a position (328b OR).</p>
<p>Employment contract, introductory questionnaire and forms, data created by or about the employee in the course of the employment relationship</p>	<p>Personal information and identification data such as name, personal and business address, personal and business telephone number, personal and business email address or other contact information, date and country of birth.</p> <p>Personal data related to family and social circumstances, such as gender, age, marital status (including the name and contact details of the emergency contact).</p> <p>Employment-related personal data such as employee number, signature, employment status, social security and tax number, insurance number, country of residence, nationalities, photograph, emergency contacts and passport data, work and residence permits, immigration status and residence status information.</p> <p>Qualifications and certifications, including current and previous positions, education and training courses, resume, records of education and work accomplishments, in some cases: Contact details of reference persons and</p>	<p>The data will be processed to the extent necessary within the scope of the employment relationship (328b OR) and to enable efficient business operations. In certain cases (external relationship), the employee's consent is obtained, e.g. for the use and publication of photos/videos for</p>

Data source	Data	General purposes
	<p>results of suitability assessments and interview evaluations/feedbacks.</p> <p>Job information and work metrics such as position, title, employment contract, supervisor, job range, performance history, employment status, absence information, timesheet, training records, performance and development goals. In some cases, we may also record results of capability assessments, safety reports and incidents, and job-related feedback.</p> <p>Salary, allowance, benefit, and expense data such as salary data, payroll data, retirement plan number and contributions, fringe benefits, bonuses, severance pay, stock options, dependents, beneficiaries, or health insurance benefit designation, bank statements, expense reports and statements, bank account data, credit card data, telephone expenses, and insurance data.</p> <p>Electronic identification data and information (to the extent the employee has access to or is affected by such systems or applications), such as access logs, IT and Internet usage, device identifiers (mobile device ID, PC ID, etc.), registration and login data, IP address, tracking and analytics data, records (e.g., voicemail/call records), posts to enterprise platforms, password recovery data, information obtained via IT security tools.</p> <p>When using your own or business mobile devices that are connected to the Pilatus applications, device data is collected to monitor technical security (including the apps installed on the devices and location data for emergencies or device loss).</p> <p>Financial and other details such as account information, credit checks, payment details and transactions, investigative information, and disciplinary history.</p> <p>Other personal data, namely if the employee or others (e.g. colleagues) register such data on or in Pilatus' systems, programs and applications, such as business documents containing personal information (e.g. inquiries, questions, complaints, orders and related documents, emails, reports, contracts, presentations, minutes, work products), photographs, images and/or videos.</p> <p>Membership in a religious community (e.g. if this is required for tax purposes);</p> <p>Health and medical information, including disability status, special working conditions (e.g. use of a standing desk)</p>	<p>business purposes.</p>

Data source	Data	General purposes
	<p>and medical equipment required at the workplace, information on work-related injuries and illnesses, data for emergency travel assistance (blood group, medical history, allergies). This data is also processed as part of occupational health management;</p> <p>Race or ethnicity (e.g., when used for diversity purposes); and</p> <p>In some very limited cases: Union affiliation, political opinions, and sex life or sexual orientation (e.g., when used for studies of unequal treatment).</p> <p>Data on criminal convictions and offenses for compliance with legal and contractual requirements (e.g., for military customers or for executives).</p>	

Irrespective of this, there may always be constellations in which we process personal data about you that is not mentioned here or whose purposes are not mentioned here. In these cases, we will inform you separately about data protection in connection with the respective processing, insofar as this is required by law.

5 Purposes of processing & prerequisites

The following subsections describe why and under what conditions Pilatus processes personal data.

Personal data requiring special protection will only be processed by Pilatus in accordance with applicable law:

- With the express consent of the employee for certain activities in accordance with applicable law;
- When necessary for the exercise of rights under labor, social security or social protection laws or under collective bargaining agreements, or for preventive and occupational medicine or work capacity assessment; or
- To the extent necessary for the establishment, exercise and defense of legal claims; and
- Personal data relating to criminal convictions and criminal offenses will only be processed by Pilatus if permitted by law. Further legal bases for the processing of personal data may be contained in applicable Swiss and international primary and secondary laws, regulations or binding industry standards.

5.1 Purpose of the employment relationship

Pilatus processes personal data for the decision on the establishment of an employment relationship or - after the establishment of the employment relationship - for its implementation or termination. The specific purposes of data processing depend on the respective process and the phase of the employment relationship. Processing in this context is limited to what is necessary for the establishment and implementation of the employment relationship or required by law.

5.2 Other purposes

Pilatus may also process personal data to protect its interests or the interests of third parties, provided that the employee's own interests do not override the interest of Pilatus. Examples include:

- Voluntary services (e.g. newsletter);
- Internal publications (e.g., anniversaries, promotions, etc.); and
- Risk and Compliance Controls.

Pilatus' interest in specific data processing is based on the above-mentioned purposes. These must be proportionate and are generally based on the fact that the employee is in an employment relationship that involves additional legal and regulatory obligations with which Pilatus, as an aircraft manufacturer, must fully comply.

5.3 On the basis of the consent of the employee

In exceptional cases, Pilatus will obtain the employee's consent to the processing of personal data. This applies in particular to any consent given by the employee concerning:

- Publication of employee photos/information on personal details/professional career on the Pilatus homepage;
- Processing of special categories of personal data
- Storage of passport copies.

If Pilatus asks employees to consent to the use of personal data for a specific purpose, Pilatus will inform employees that they can revoke their consent at any time. Consent is voluntary.

5.4 Compliance with legal obligations

As a regulated aircraft manufacturer, Pilatus is subject to various Swiss and international primary and secondary legal, regulatory or industry-specific requirements under which Pilatus must process personal data. Relevant here and with regard to the employment relationship are retention, reporting and information obligations as well as independence rules, insofar as these are imposed on Pilatus by national authorities such as tax and employment offices, social insurance carriers and supervisory and other authorities. The processing in these cases aims at ensuring compliance with legal and regulatory obligations.

6 Duration of data storage

Where necessary, Pilatus processes personal data for the duration of the employment relationship, which may also relate to its establishment and termination. In addition, Pilatus is subject to various retention, documentation and long-term archiving obligations arising in particular from the Swiss Code of Obligations, the relevant employment law, other applicable laws and regulations relating to Pilatus' aircraft manufacturing business, and other secondary legislation. The retention period is ultimately also determined by the statutory limitation periods and is generally ten years, with certain tax data having to be archived for 12 years. In addition, aircraft-related records may need to be retained for as long as the aircraft is in service. At the same time, applicable data protection laws require that Pilatus does not retain personal data in identifiable form for longer than is necessary for the purpose for which the personal data is processed. Through the technical processes in IT applications and the definition of guidelines, Pilatus ensures that personal data is deleted or anonymized when it is no longer required.

In the event of anonymization, the data is only available to Pilatus in the form of so-called metadata without direct reference to individuals for statistical evaluations (e.g. proportion of male and/or female applicants, number of applications in a specific period, etc.).

If you have agreed to be included in our Talent Pool (without applying for a specific job), we will keep your application and personal data for 12 months after profile creation. After 12 months, we will inform you about the upcoming deletion and you will have the opportunity to agree to further storage. If you do not get back to us, the data will be automatically deleted and the user account will be closed.

After the expiry of an applicable retention period, Pilatus will securely delete or anonymize personal data unless there are special circumstances that require Pilatus to retain the personal data, e.g. due to legal or regulatory obligations or to settle potential cases. For more information about the specific retention periods that apply to your personal data, please contact our data protection officer.

7 Use of processors

Pilatus has contracted with the following categories of processors to enable its operations and the processing described above:

- Data centers and IT service providers;
- Provider of hosting, backup and database services;
- SaaS applications for administration, communication and accounting;
- Communication service providers;
- HR, tax, finance, IT and accounting consultants

These service providers only have access to your data to the extent that this is necessary for the performance of their tasks. These service providers are obliged to process your data within the framework of the data processing agreement concluded by Pilatus and are subject to Pilatus' instructions.

8 Transfer of personal data to third countries

For transfer to countries without adequate protection, Pilatus applies EU standard contractual clauses (incl. FDPIC requirements), binding internal company regulations or other measures to ensure an "adequate level of protection" in accordance with legal requirements. Data transfers can take place worldwide.

9 Transmission of personal data to third parties

In order to provide its services and enable safe and efficient operation of the aircraft, Pilatus may disclose personal data to third parties such as Pilatus subsidiaries, Pilatus centers, aircraft owners and operators, maintenance service providers, flight safety authorities or other relevant third parties. Any such transfer will be strictly limited to the data required in the particular case. These parties will provide you with a separate data protection notice containing further information about the processing of their personal data. In most cases, such personal data will be limited to business contact information or work products containing such data.

10 Updating this Data Protection Notice

Pilatus reserves the right to amend this Data Protection Notice from time to time to ensure that it complies with legal requirements at all times or to implement changes to Pilatus services. The new Notice will apply upon its publication. You can find the latest version at: <https://inside.pilatus-aircraft.com/?navact=68>