

# APPLICANT PRIVACY STATEMENT (UK)



As a job applicant, your privacy is very important to us at CAE. This data protection privacy notice explains which information we receive from you, how it is used and how it is protected by CAE. This data protection privacy notice and the procedures outlined therein comply with EU Data Protection Regulation 2016/679 of 27 April 2016 (General Data Protection Regulation (GDPR)) and the relevant national legislation of the EU Member States on implementing the GDPR (hereinafter jointly referred to as the "Regulations").

The privacy notice applies to the following legal entities in the UK:

- CAE (UK) plc;
- CAE STS Limited;
- CAE Aircrew Training Service plc;
- CAE Training & Services UK Ltd; and
- CAE Oxford Aviation Academy (Oxford) Limited T/A CAE Oxford Aviation Academy.

---

## Personal data

Each of the CAE legal entities in the UK are a "data controller". This means that we are responsible for how we collect, store and use personal data that we have received either directly from you or indirectly (e.g. via an employment agency). We are required under the Regulations to notify you of the information contained in this privacy notice.

Typically, the personal data that CAE collects and processes about you may include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK, including nationality and passport details;
- information for any applicable security checks / clearance;
- photographs; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

Within the sense of the Regulations, some of this data is regarded as special categories of personal data, these special categories of personal data includes health information, trade union membership, information about your race or ethnicity and sexual orientation; or information about criminal convictions and offences.

CAE also processes video data as CAE properties are normally equipped with video surveillance systems.

---

## How is your personal information collected?

We typically collect personal information about potential employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

---

## Processing and purpose of use

CAE uses the personal data collected from you in order to properly execute the application process. The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

CAE has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

CAE therefore collects, uses, administers, records, transfers and stores ('processes') personal data for the following purposes:

- examination and evaluation of your application documents;
- communication with you during the application process;
- travel planning and hotel accommodation if necessary;
- carrying out telephone interviews and/or face-to-face interviews;
- recruitment decisions; and
- to comply with any legal obligation.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

Video recordings are made in order to ensure the security of the premises, to record illegal behaviour or acts and to prevent crimes. Access data is processed for the purpose of visitor management and access control, if necessary.

CAE also processes data to comply with the applicable laws (e.g. immigration regulations) and generally for any other purpose that is necessary or related to the relationship between CAE and you.

The aforementioned facts are collectively identified as "Purposes".

All of this is considered necessary to protect the legitimate interests of CAE in accordance with the applicable legislation and to give proper consideration to your interests.

CAE processes your personal data only in conformity with the applicable Regulations and other policies or regulations. CAE reserves the right to update and amend this data protection privacy notice from time to time to the extent necessary in relation to our legitimate business interests (e.g. changes to Regulations).

---

## Disclosure of personal data

We will only use your personal information for the purposes 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. CAE may disclose personal data in order to comply with legal requirements (e.g. in relation to audits, investigations or consultations with competent authorities and social security agencies), to respond to demands or to protect the interests of individuals. Disclosures shall be made in accordance with the Regulations.

Your information will be shared internally within the CAE worldwide network for the purposes of the recruitment exercise. This includes members of the Human Resources team, interviewers involved in the recruitment process and managers in the business area with a vacancy. CAE shall ensure that anyone who receives and processes personal data during the recruitment process has received training in data protection when dealing with personal data.

CAE will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred outside the European Economic Area (EEA) if members of the Human Resources team, interviewers involved in the recruitment process and managers in the business area with a vacancy are based at another CAE location worldwide. Furthermore, if you applied for the position through the CAE corporate website ([www.cae.com](http://www.cae.com)), the application tool is called Workday which is hosted in the Dublin, Ireland. CAE has a personal data processing agreement in place with Workday in accordance with the Regulations to ensure they safeguard your data in accordance with the Regulations.

Further information is available from CAE upon request

---

## Protection of personal data

CAE regards your personal data as an asset that must be protected. We are committed to ensuring that your personal data is stored securely, only accessible by authorised persons and only transferred in accordance with this privacy notice and after the implementation of appropriate technical and organisational measures in compliance with the Regulations. Nonetheless there are third parties that may unlawfully try to access systems or intercept transmissions or communications containing personal data. CAE continuously uses its reasonable efforts in line with industry standards to protect personal data of customers but cannot absolutely guarantee that such unlawful actions will not occur. CAE has in place a data breach response plan.

---

## How long will we use the information for?

If your application for employment is unsuccessful, CAE will hold your data on file for six months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed unless we are required by law to retain it, in which case we will notify you.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held as an employee, worker or sub-contractor will be provided to you in a new privacy notice.

---

## Rights of the data subject

You, as the individual (data subject) whose personal data is processed by CAE for the aforementioned purposes, have a number of rights. You can:

- access and obtain a copy of your data on request;
- require CAE to change incorrect or incomplete data;
- require CAE to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where CAE is relying on its legitimate interests as the legal ground for processing; and
- ask CAE to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override CAE's legitimate grounds for processing data.

If you would like to exercise any of these rights or for further information regarding your rights to access your personal data, please contact the Data Protection Officer for the operating division you are applying for a position with.

Insofar as the processing of sensitive personal data by CAE is based on your consent, you have the right to withdraw this consent. However, withdrawal of consent will not prevent CAE from processing personal data where your consent for us to process the data is not required. You also have the right to object to the processing of your personal data by CAE, to restrict the processing or to request its erasure insofar as there is an existing basis in accordance with the Regulations. CAE will respond to any such requests in accordance with the Regulations.

You have the right to lodge a complaint with the Information Commissioner's Office (the UK's data protection authority) if you believe that CAE's personal data processing is not in compliance with regulations, or if CAE does not respond to your requests in timely and/or appropriate manner, or if they are not answered at all.

CAE will only store your personal data for the duration necessary and in a manner permitted by the Regulations or other applicable laws.

---

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to CAE during the recruitment process. However, if you do not provide the information, CAE may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

---

### **Contact details of CAE and further information**

If you have any questions in connection with this notification or the processing of personal data by CAE in general, or if you have questions or requests for information, you can contact the Data Protection Officer below for the relevant operating division.

Further information on your rights and CAE's obligations can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

#### **CAE (UK) plc – Defence & Security division**

Christopher Smith  
Data Protection Officer  
Tel: +00 44 1444 251051  
Email: christopher.smith@cae.co.uk

#### **CAE Aircrew Training Services plc**

Christopher Smith  
Data Protection Officer  
Tel: +00 44 1444 251051  
Email: christopher.smith@cae.co.uk

### **CAE (UK) plc – Civil division**

Ian Taylor  
Data Protection Officer  
Tel: +00 44 1444 251002  
Email: [ian.taylor@cae.com](mailto:ian.taylor@cae.com)

### **CAE Training & Services UK Ltd**

John Masterson  
Data Protection Officer  
Tel: +00 44 1293 543541  
Email: [john.masterson@cae.com](mailto:john.masterson@cae.com)

### **CAE STS Limited**

Ian Taylor  
Data Protection Officer  
Tel: +00 44 1444 251002  
Email: [ian.taylor@cae.com](mailto:ian.taylor@cae.com)

### **CAE Oxford Aviation Academy (Oxford) Limited T/A CAE Oxford Aviation Academy**

Ken Chapman  
Data Protection Officer  
Tel: +00 44 1865 840342  
Email: [gdpr-oxforddpo@cae.com](mailto:gdpr-oxforddpo@cae.com)