

## **Privacy Statement**

### **TC Skyward Aviation Ireland Limited**

This privacy statement explains how and why TC Skyward Aviation Ireland Limited whose registered office is at 70 Sir John Rogerson's Quay Dublin 2, Ireland (“**SKY-I**” or “**We**”), as data controller, use personal data and what we do to ensure that your information is kept safe and secure in accordance with the General Data Protection Regulation and any other applicable data protection and privacy laws (“**Data Protection Laws**”).

#### **1. What type of information we have, how we get this information and uses for this information**

##### **1) Information that you give us**

Usually this information is:

- provided by the individuals themselves;
- collected in the process of providing goods and services to our corporate customers (such as through correspondence and exchanging business cards);
- provided to us by third parties (such as other businesses we work with); or
- obtained from external sources.

##### Type of Information:

The types of personal data (meaning information which relates to an identifiable individuals) we hold about these individuals typically consist of some or all of the following:

- contact information (such as name, address, phone number and email address);
- bank details (provided by a supplier and processed when we receive or make a payment).

##### Use of Information:

We may collect and process personal data relating to individual business and professional contacts and other people we engage with in the course of business, such as the employees of our customers.

##### **2) Information that our website collect about you**

##### Type of Information:

If you visit our website it will automatically collect some information about you and your visit, including the Internet protocol (IP) address used to connect your device to the Internet and some other information such as your browser type and version and the pages on our site that you visit. Our website may also download ‘cookies’ to your device.

##### Use of Information:

We may collect and process personal data relating to individual business and professional contacts and other people we engage with in the course of business, such as the employees of our customers.

### **3) Information about you via communications**

#### Type of Information:

If you exchange emails, telephone conversations or other electronic communications with employees or other staff members of Tokyo Century Corporation group, our information technology systems will record details of those conversations, sometimes including their content.

#### Use of Information:

We may collect and process personal data relating to individual business and professional contacts and other people we engage with in the course of business, such as the employees of our customers.

### **4) Information about you via our security systems**

#### Type of Information:

Some of our premises have closed circuit TV systems which may record you if you visit our premises.

#### Use of Information:

This information is gathered for security and safety purposes.

## **2. Why do we have it**

Under the Data Protection Laws, the lawful bases we rely on for processing this information are:

- fulfil our contractual obligations or exercise contractual rights (such as paying our suppliers);
- communicate with other organisations, advisors or intermediaries;
- send business related communications (usually by email);
- in order to comply with our legal obligations;
- pursue our legitimate interests in operating and promoting the success of our business, or to pursue the interests of our corporate customers in providing our goods and services.

## **3. Disclosure and international transfer of your information**

We may disclose and/or share personal information about you, where reasonably necessary for the various purposes set out above:

- to the other members of the Tokyo Century Corporation group of companies;
- to your colleagues within the organisation that you represent;

- to service providers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- to a person who takes over our business and assets, or relevant parts of them; or
- in exceptional circumstances:
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
  - where we are required by law to disclose.

These disclosures may involve transferring your personal information overseas. You should be aware that this may include transfers to countries outside the European Economic Area (EEA), which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to other members of the Tokyo Century Corporation group of companies or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your personal information is protected, on terms approved for this purpose by the European Commission.

Please contact us if you wish to obtain information concerning such safeguards (see Contact Us below).

#### **4. Retention of your information**

We only retain personal data for as long as is necessary for the specific purposes it was collected for (or for related compatible purposes such as complying with applicable legal, accounting or record-keeping requirements).

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **5. Your rights**

##### **Your rights in relation to your personal data**

You have the right to request access to, rectification, or erasure of your personal data, or restriction of processing or to object to processing of your personal data, as well as the right to data portability. The following is a summary of what these rights involve:

- **The right of access** enables you to receive a copy of your personal data.
- **The right to rectification** enables you to ask us to correct any inaccurate or incomplete personal data.
- **The right to erasure** enables you to ask us to delete your personal data in certain circumstances, for example where it is no longer necessary for us to process it.

- **The right to restrict processing** enables you to ask us to halt the processing of your personal data in certain circumstances, for example if you want us to verify its accuracy or our legitimate interests in processing it.
- **The right to object** enables you to object to your personal data being processed on the basis of our legitimate interests (or those of a third party). You also have the right to object to us processing your personal data for direct marketing purposes.
- **The right to data portability** enables you to ask us to transmit the personal data, that you provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party.

If you wish to exercise any of these rights, please see Contact Us below. We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request where there is a legal basis to do so, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

#### **Right to withdraw your consent**

In the event that we request, and receive, your consent to process your personal (or explicit consent for special data) for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

## **6. How to complain**

You have the right to lodge a complaint with your local supervisory authority, the Office of the Data Protection Commissioner, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland if you consider that the processing of your personal data infringes the GDPR.

The Irish Data Protection Commission can also be contacted at [info@dataprotection.ie](mailto:info@dataprotection.ie).

## **7. Contact us**

You can send comments and requests regarding this privacy policy statement and our processing of personal information to 3 Kanda-neribeicho Chiyoda-ku, Tokyo 101-0022, Japan or by email to: [amo@tokyocentury.co.jp](mailto:amo@tokyocentury.co.jp).

## **8. Changes to this policy**

We will update this privacy statement from time to time, it will be posted on our website ([www.tokyocentury.co.jp/en/](http://www.tokyocentury.co.jp/en/)).

Last Updated: 05/08/2019