# PRIVACY INFORMATION NOTICE

# related to ESOP (Employee Share Ownership Plan)

## Introduction

Airbus SE and its Affiliates (also known as, “Airbus”, or “we” or “us") appreciate your interest in our Employee Share Ownership Plan (also known as “ESOP”), that enables you to participate in the company's success through the acquisition of shares.

The protection of your privacy and Personal Data is an important concern to which we pay special attention throughout our business processes and when you are involved in the ESOP process.

Airbus is committed to protecting the rights of individuals in line with the General Data Protection Regulation (reference EU2016/679) 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 (hereinafter referred as : “GDPR”) as well as each applicable national Personal Data protection laws and regulations (collectively referred as “Data Protection Laws and Regulations”).

This Privacy Notice will inform you of the Personal Data we process when you access/use ESOP; how we use and disclose your Personal Data; how you can control the use and disclosure of your Personal Data; and how we protect your Personal Data.

ESOP enables employees to participate in the results of the company by participating in the company's success through the acquisition of shares.

## Which sources and what Personal Data do we use?

Personal Data is information that can be used to identify a person either directly or indirectly (hereinafter referred as “Personal Data”). This definition covers a wide range of data enabling the identification of an individual.
The Personal Data we process under this Privacy Notice are as follows:

- ❑ Identification data (e.g. your name, maiden name, first name, address and your email address, your date and place of birth, your nationality and your native language)
- ❑ Professional data (e.g. your Airbus ID)
- ❑ Economic & Financial data (e.g. your bank account number, your BIC, your IBAN and the number of Shares purchased)
- ❑ Account information (role and permissions, settings and preferences, username, password…)
- ❑ Digital Activity (user activity, browsing history…)

Please note that depending on the country of your workplace other categories of Personal Data may be collected.

- China: sales proceeds and the amount of dividends relating to the Shares granted
- France: national social security number
- Morocco: the amount of your net salary and your identity card number
- United States: national social security number
- Canada: national social security number

We may receive this Personal Data directly from you, during your subscription to the ESOP service via the dedicated platform. Airbus also collects data you provided as your employer during the recruitment process and the employee's management.

## What are the purposes of the processing of your Personal Data?

By using ESOP services, Airbus will collect and process your Personal Data for the following purposes (hereinafter referred as: the 'Purposes'):

1. *Website Browsers / Administration.*
    - We use your Personal Data for administrative purposes, including to help us better understand how you access and use ESOP; to provide reports to prospective partners, service providers, regulators, and others; to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect our customers, partners and us; and to enforce our policies, directives and processes.
2. *Communication.*
    - We use your Personal Data to communicate with you, including responding to requests for assistance. We can communicate with you in a variety of ways, including email.
3. *Research and development.*
    - We use your Personal Data for research and development purposes, including improving our ESOP, and user experience and for other research and analytical purposes dedicated to improving ESOP.
4. *Legal and regulatory compliance.*
    - We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.
    - We use/store your Personal Data in order to conduct internal audits, which are necessary to ensure we comply with our internal policies, as well as with every legal or regulatory provisions applicable to Airbus.
5. *To protect us and others*.
    - Where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of policies, terms, and other policies.
6. *Brand promotion and maintenance*
    - We use your Personal Data to engage an investor relation with you, when you decide to get Shares

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 (for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation for example). If we need to use your personal information for an unrelated purpose, we will notify you prior this further data processing and provide you the relevant information notice.

## What is the legal basis for processing of your Personal Data?

As a responsible company, we need a lawful basis for collecting and/or processing your Personal Data in accordance with the provisions set out in the GDPR and the relevant applicable Data Protection Laws and Regulations. The legal basis for processing your Personal Data under this Privacy Notice are:

- **To comply with contractual obligations.**

When you subscribe to an ESOP offering or a particular service through ESOP, the purposes of processing your Personal Data are primarily determined by performance of the subscription agreement and that service, and we will process your information so that we can provide that service to you.

- **Within the scope of a legitimate interest.**

On occasion taking into account the minimum privacy impact for you, the processing of your Personal Data might be necessary for the following legitimate interest:

    - For fraud detection and prevention and investigation of criminal acts.

- For Compliance with foreign law, law enforcement, court and regulatory bodies' requirements
- For Information, system, network and cyber security within Airbus
- For Service development and enhancement (incl. the analysis and optimisation of ESOP)

❑ **On the basis of Airbus' legal obligations**

Airbus, as any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for Airbus in order to fulfil these obligations.

## Who will receive your Personal Data?

- Authorised persons working for or on behalf of Airbus, on a need-to-know basis for the purposes as outlined in this Privacy Notice
- Our agents, service providers and advisers providing the variety of products and services we need such as:
  - Société Générale Securities Services and Akkalia as the plan administrator (located in France)
  - Banks for share management (in relation to your Country - please refer to the Employee Share Ownership Plan Rules for more information)
- Other authorised third parties in connection with any merger, reorganization, a sale of some or all Airbus assets, or a financing or acquisition of all or a portion of our business by another company.
- Law enforcement or government authorities or other legal process to comply with applicable law, or in response to any subpoenas, court orders, or to establish or exercise our legal rights or to defend against legal claims.

Addendums relating to geographical area of implementation

- ***Addendum Canada***
  Please note that by default, the trading account manager in Canada is Computershare.
  As provided in the 2021 Airbus Employee Share Ownership Plan Rules, instead of Computershare, you may choose Société Générale as your trading account manager.

- ***Addendum China***
  Airbus will transfer some of your Personal Data (including sales proceeds and the amount of dividends relating to the Shares granted) to the State Administration of Foreign Exchange to comply with its legal obligations.

- ***Addendum France***
  Personal Data collected will be processed by Amundi to allocate the shares on your Airbus group collective saving plan as selected during the subscription. To that extent, Amundi collects your national security number in order to comply with its legal obligations under the Social Security Code.

- ***Addendum Germany***
  As provided in the 2021 Airbus Employee Share Ownership Plan Rules, instead of Société Générale, you may choose Commerzbank as a trading account manager. If so, Commerzbank will process your Personal Data in accordance with this privacy policy.

- ***Addendum Morocco***
  Airbus will collect and transfer your Personal Data (including the amount of your net salary and your identity car number) to the Market Authority to comply with its legal obligations.

- ***Addendum UK***
  As provided in the 2021 Airbus Employee Share Ownership Plan Rules, instead of Société Générale, you may choose Equiniti as a trading account manager. If so, Equiniti will process your Personal Data in accordance with this privacy policy.

- ***Addendum USA***
  Please note that by default, the trading account manager in USA is Computershare.
  As provided in the 2021 Airbus Employee Share Ownership Plan Rules, instead of Computershare, you may choose Société Générale as your trading account manager.

## Which countries and/or regions will Airbus transfer your Personal Data to?

Airbus processes your Personal Data mostly in the EEA. On occasion Personal Data is transferred to the relevant Recipients as described in Section "*Who will receive your Personal Data*?, on a need-to-know basis, including entities outside the EEA.
This transfer is subject to appropriate safeguards, within Airbus through the legal framework of our Binding Corporate Rules, that can be found on our website www.airbus.com or viewed here Airbus BCR's or through alternative contractual frameworks or relevant adequacy decision where the relevant data recipients as defined in Section "*Who will receive your Personal Data?*" are involved in the data processing.

Our Binding Corporate Rules allow us to transfer Personal Data within our international organisation, and they include a list of countries (below) which are structured to allow us to transfer Personal Data to the countries where we have a presence. Below is a list of countries where Airbus operates:
*Algeria, Australia, Belgium, Brazil, Canada, Chile, China, Czech Republic, Colombia, Denmark, Egypt, Finland, France, French Guyana, Germany, Greece, Hong Kong, Hungary, India, Indonesia, Ireland, Italy, Japan, Kazakhstan, Libya, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Norway, Oman, Philippines, Poland, Qatar, Romania, Russia, Saudi Arabia, Singapore, Slovakia, South Africa, South Korea, Spain, Sweden, Taiwan, Tanzania, Thailand, Tunisia, Turkey, United Kingdom, United States of America, Uruguay, United Arab Emirates, Vietnam.*

## For how long will your Personal Data be stored?

The Personal Data will be processed and stored for the full duration of your subscription to ESOP, in accordance with the GDPR or any local data protection laws requirements or as long as it is required to meet our contractual and statutory obligations. We may collect and store any data that must be retained by Airbus in order to comply with a legal or regulatory obligation and/or for the establishment, exercise or defense of legal claims.

## What about the security of your Personal Data?

We use technical and organizational security measures in order to protect the Personal Data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

All Airbus' data processors are required to take appropriate security measures to protect your Personal Data in line with this policy.

## What are your rights and how to exercise them?

You may at any time exercise your data protection rights (under some circumstances provided by law):

- **Right to access/obtain a report detailing the information held about you**: You have the right to obtain confirmation as to whether or not your Personal Data is being processed by Airbus and if so, what specific Personal Data is being processed.

- **Right to correct Personal Data:** You have the right to rectify or request to have rectified any inaccurate Personal Data concerning you.

- **Right to be forgotten**: In some cases, for instance, when the Personal Data is no longer necessary in relation to the Purposes for which they were collected, you have the right for your Personal Data to be erased.

- **Right to restrict the processing of your Personal Data**: You have the right to restrict the processing of your Personal Data, for instance when the processing is unlawful and you oppose the erasure of your Personal Data. In such cases, your Personal Data will only be processed with your consent or for the exercise or defense of legal claims.

- **Right to data portability:** You have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit those Personal Data to another data controller.

- **Right to object:** In some cases required by law, you may ask us to stop processing your Personal Data.

To this effect, please contact Airbus in writing either by e-mail at the following address: dataprotection@airbus.com or by writing to the addresses below, enclosing a copy of a document evidencing your identity.

Airbus SAS, Head of Data Protection, HLP, 2 rond-point Emile Dewoitine 31700 Blagnac cedex. France

## Are you obliged to provide your Personal Data?

Under certain circumstances, when some Personal Data are necessary to enter into a contract or to comply with legal obligation, any failure to provide the requested Personal Data may conduct us not being able to fulfil our contractual/legal obligations or to achieve the expected results.

## Are your Personal Data the basis for automated decision-making, including profiling?

As a matter of principle, we do not use fully automated decision-making processes or profiling. In the event that we should use such processes, we will advise you in advance.

## How contact Airbus in respect of your Personal Data?

If you are unhappy with the way in which your Personal Data has been processed or should you have questions regarding the processing of your Personal Data, you may refer in the first instance to the Airbus Data Protection Officer, who is available for enquiries or complaints, at the following email address:
dataprotection@airbus.com or you can write to the address below:
Airbus SAS, Head of Data Protection, HLP, 2 rond-point Emile Dewoitine 31700 Blagnac cedex. France

## How ask for assistance to the competent authorities?

If you remain unsatisfied, then you have the right to apply directly to a Data Protection Supervisory Authority.
Listed below are the relevant authorities you may contact depending on your location and/or situation:

| | |
|---|---|
| **FRANCE:** | CNIL: Supervisory Authority France |
| **GERMANY:** | Datenschutz-hamburg: Supervisory Authority for Airbus Operations GmbH<br>or<br>lda Bayern: Supervisoy Authority for Airbus Companies in Bavaria, Germany<br>or<br>any other competent regional German authority as the case may be, |
| **SPAIN:** | AGPD.Supervisory Authority Spain |
| **UK:** | ICO: Supervisory Authority UK |

# Cookies Policy

**WHAT ARE COOKIES?**

Cookies are small files or amount of information that may be stored, accessed and removed from your device when you access the website dedicated to ESOP subscription (hereinafter referred as "the Website").

For instance, a "Cookie" may refer to "http cookie", flash cookie" (used by some applications or websites relying on *Flash* technology), local storage area of your internet browser, unique identifier calculated from your internet browser characteristics (also known as "browser fingerprinting"), or unique identifiers related to your device or your internet browser (device serial number, MAC address, Android ID, advertising ID, etc...).

Cookies allow us to recognise your device and store information about your preferences or past actions. We may use Cookies:

(i) to record the preferences of our users,
(ii) to enable us to optimise the design of the Website,
(iii) to ease navigation, and increase the user-friendliness of the Website,
(iv) to analyze the usage of the Website, and/or to identify the most popular sections of the Website,
(v) to facilitate secure online access so that you do not need to enter your user ID and password again when you access the Website.

**WHICH COOKIES DO WE USE?**

Cookies may contain Personal Data. The table below aims to inform you about the type and purpose of each cookie, and the type of Personal Data processed inside which we may use on the Website:

| NAME OF COOKIE | PURPOSE | RETENTION PERIOD | COOKIE TYPE | MANDATORY |
|---|---|---|---|---|
| _pk_id.**** | Audience analytics (anonymised user ID) | 1 month | _pk_id.**** | YES |
| _pk_ses.***** | Technical cookie to keep the user session | 1 hour | _pk_ses.***** | YES |
| best-locale | User's preferred locale | Session lifetime | best-locale | YES |
| PHPSESSID | User's session id | Session lifetime | PHPSESSID | YES |

**HOW CAN YOU DISABLE OR DELETE COOKIES?**

When the Cookies we use are strictly necessary for technical reasons, they are marked as "mandatory" on the table above. Those Cookies does not require consent from you. However, if you choose not to accept Cookies that are strictly necessary for the provision of our services provided by our Website, it may result in a reduced availability of such services.

You can prevent Cookies from being stored on your device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can also delete Cookies already on your device at any time through your browser's settings.

For the purpose of statistical analysis, we use analytics tools relying on specific Cookies. You may object at any time to the collection and analysis of statistical data regarding your access to and use of the Website through the cookies settings interface mentioned above.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

# Modification of the Privacy Notice

Airbus will update this Privacy Notice from time to time in order to reflect the changes in our practices and services and also to remain compliant to Data Protection Laws and Regulations. We will inform you of any substantial modification in how we process your Personal Data.