Harrods Aviation Privacy Policy

1. Harrods Aviation Commitment to your Privacy

Harrods Aviation respects your privacy and your desire to understand how your information will be handled and used. This Policy explains how we collect, use and store your information. Using your information in a way that you are comfortable with and keeping your information secure is an integral part of the first class service offering we aim to provide. Harrods Aviation will ensure that all information protection and customer legislation standards are met when handling any of your personal information.

References in this Privacy Policy to "we", "us" and "Harrods Aviation" are to Harrods Aviation Limited (company number 02043317), registered office 87-135 Brompton Road, Knightsbridge, London SW1X 7XL. Harrods Aviation Limited is a registered information controller with registration number Z7844628.

This policy also applies to Air Harrods Limited (company number 03165147), registered office 87-135 Brompton Road, Knightsbridge, London SW1X 7XL. Air Harrods Limited is a registered information controller with registration number Z7612287.

2. What information do we collect and how do we use it?

In order to comply with UK Immigration laws, we may collect Passport or Identity Card information as well as other personal information to facilitate your arrival to/or departure from the United Kingdom. If you are travelling with children, it will be necessary to collect the same information relating to them. This information will be shared with the Home Office and other government departments and agencies.

If you are a visitor to any of our luxury FBO locations, we will collect personal information from you to meet our obligations for your Health and Safety during your visit.

If you are a prospective employee and have sent in your CV, we may use your information to contact you by email or other electronic means about a specific job role, or opportunity that we believe you might be interested in.

3. Information collected when you use our services

When you are a passenger on an aircraft provided by Harrods Aviation or Air Harrods or where we are acting as a broker for such a flight either private or commercial, your personal data will be included on a passenger manifest and may be shared with other operators involved in the flight. Your details may also be shared with landing sites for security purposes.

If you choose to pay for any of our services by card, we will need to collect your payment information in order to process card payments. We may also need to ask for additional information from you, e.g. to prevent fraudulent transactions or to comply with anti-money laundering obligations for high value transactions.

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4. Managing your Marketing Preferences

Where you have requested further information about our services either at a trade show or via another means of communication, we will use the details you have provided to continue the correspondence with you. If at any point you wish to have your details removed, please email us at <u>data.protection@harrodsaviation.com</u>.

5. Our Group Companies

The Harrods Group includes Harrods Limited, Harrods International Limited, Harrods Estates Limited, Harrods Aviation Limited and Air Harrods Limited. Please visit the Harrods and Harrods Estates websites for details of their separate Privacy Policies.

6. CCTV

To ensure your safety and for the prevention and detection of crime, CCTV is in operation during your visit to any of our FBO locations.

Please be aware that if we are requested to provide CCTV images of you or any other personal information relating to you by the police or any other regulatory or government authority investigating suspected illegal activities, we are obliged do so.

7. How can you manage the information we hold about you?

Should you wish to know more about what information we hold about you, including making changes to or request its deletion, you are entitled by law to make a Data Subject Request. You can make such a request by emailing us at <u>data.protection@harrodsaviation.com</u>.

If you are an EU citizen, you may contact our representative by emailing <u>EURepresentative.Harrods@twobirds.com</u> or by writing to:

Bird &b Bird GDPR Representative Services SRL Avenue Louise 235 1050 Bruxelles Belgium

Please note that we may need to exclude certain information as part of your request, e.g. in order to protect the privacy of other individuals or if we are permitted to exclude the information for legal or other reasons.

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8. How do we keep your information secure?

We make sure that we have information security measures in place to keep your information secure. Where we ask third parties to work on our behalf, before sharing information we always make sure that they have sufficient information security measures in place.

Information you provide to one of the Harrods Group companies may be shared within the Harrods Group of companies. We also work with a number of third parties to help us deliver an excellent service to you. We require all third parties that interact with information to undergo an Information Security Due Diligence Assessment to ensure that information is only shared where third parties have appropriate security measures in place.

We will not share your information with any third parties who might wish to market their goods and services to you unless you have provided your consent. Harrods Aviation does not routinely share information outside of the European Economic Area (EEA). If it is necessary, we will only do so with the relevant protection in line with data protection legislation requirements.

9. How long will Harrods Aviation keep my information?

Harrods Aviation is committed to keeping your personal information only for so long as is necessary or where we have a legitimate interest to continue doing so. Where Harrods Aviation no longer requires information to be in a format where you can be identified personally, e.g. where we keep information for analytical and research purposes or transaction information, we will remove any personal details about you.

Where you pay for services using a credit card, we will only retain your personal details for a reasonable period of time (maximum up to six months) after you have completed the transaction in order to fulfil any contractual obligations such as refunds or additional charges.

10. Contacting us

When you contact Harrods Aviation through any channel (including by phone, post, email or social media), we will collect information about you in order to respond to your query, request or feedback. Please note, if you contact Harrods Aviation by phone your call may be recorded for quality, training and security purposes. Additionally, calls may be monitored (without your consent) to allow Harrods Aviation to collect information for security and regulatory purposes.

11. How will I know if this Privacy Policy changes?

If we specifically change the way in which we use your personal information or if we need to notify you about a change to the information that we hold about you, we will specifically contact you.

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Any future changes to our Privacy Policy will be updated online at harrodsaviation.com with the last date of update displayed as below. We encourage you to check this site periodically to learn about the information that we collect, use and share.

The Harrods Aviation Privacy Policy was last updated in January 2021.

