

PRIVACY INFORMATION NOTICE

Related to Airbus Pilot Cadet Training Screening Assessment

Introduction

Symbiotics Ltd (Symbiotics) acting in the name and on behalf of Airbus and the relevant Flight School from which you access this Web Application (also known as “we” or “us”) appreciate your interest in our products, services and business lines and your use of our websites, portals and “apps” (“Websites”). Your privacy is important to us and we want you to feel comfortable using our websites. The protection of your privacy and Personal Data is an important concern to which we pay special attention throughout our business processes. Personal Data collected during use of our website is processed by us according to the legal regulations valid for the countries in which the websites are maintained. However, the website will include links to other websites or applications which are not necessarily covered by this Privacy Notice. In this event, we encourage you to carefully read the privacy policies of such websites.

We are 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”).

What is Personal Data?

Personal Data is information that can be used to identify a person either directly or indirectly (hereinafter referred to as: ‘Personal Data’. A ‘personal identifier’ is a piece of information that can identify an individual. This definition covers a wide range of personal identifiers to constitute Personal Data, including name, address, email address, identification number, location data or online identifier.

What is the FAST assessment test?

FAST is an online screening test (hereinafter “Web Application”) performed by Symbiotics acting as Data Processor and accessible by any applicant through the relevant Flight School website. FAST is a mandatory step to assess your eligibility to enter into the Ab Initio training program performed by the related Flight School, deploying the Airbus Pilot Cadet Training Programme.

Which sources and what Personal Data do we use?

When you use the Web Application, Symbiotics will collect, use and process any Personal Data you provide us on behalf of Airbus and the relevant Flight School and any information generated as a result of using the Web Application, such as your IP address, the date and length of visit to the site, the pages you view.

We will also collect and/or process the following Personal Data while accessing to the Web Application:

- Answers you give to the questions you’ll be asked to answer through the FAST Assessment test,
- Your candidate number, which is generated automatically when you access the Web Application for the first time,
- Your identity information, which may include your first name, last name, surname, date of birth and gender, nationality

- Your email address,
- The date of the test,
- Your ATO center name,
- Your PPL license number (if applicable).
- Report of your assessment tests

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

By using the FAST Assessment test Web Application, Symbiotics will collect and process your Personal Data on behalf of Airbus and the related Flight School in accordance with this Notice. Your Personal Data will be used for the following purposes (hereinafter referred as: the “Purposes”):

1. Aptitude evaluation (profiling)
2. We use your Personal Data to establish your competence profile. Your profile is made of four grades, automatically generated by the Web Application and taking into consideration the answers you give to your FAST test, and in general, all the Personal Data you provide us. See Section below “Will profiling take place?” for more information.
3. Eligibility to enter into Ab initio training program
4. Based on your profile (four grades), we determine whether we should accept or deny your application. This step involves human processing, but the final decision may only be taken regarding your FAST test grades. See Section below “To what extent will decision-making be automated?” for more information.
5. Website Browsers / Administration.
6. We use your Personal Data for administrative purposes, including to help us better understand how our users access and use our websites and applications; 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.
7. Communication.
8. 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 and via your social media accounts if you have agreed, and/or text message.
9. Research and development.
10. We use your Personal Data for research and development purposes, including improving our websites, applications, services and customer experience and for other research and analytical purposes dedicated to improving our products, services, businesses, operations and processes.
11. Legal compliance.
12. We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.
13. 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.

What is the basis for processing of your Personal Data?

As a responsible company, we need a lawful basis for collecting and/or processing your data. We generally rely on a number of grounds (reasons) for our business processing.

We process 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 are:

1. As a result of your consent.

By using this Web Application, you explicitly consent that we process your Personal Data in the way described in this Privacy Notice.

Especially, you consent that we process your Personal Data to establish your candidate profile, such as described in the Section below *“Will profiling take place?”*

This profiling activity involves an automated decision-making process, described in the Section below *“To what extent will decision-making be automated?”* that you consent to.

When you have consented to the processing of your Personal Data by us, you can withdraw consent at any time by following the instructions provided in the application process or by contacting us at DataController@SymbioticsLtd.co.uk. For further information on the right of withdrawal, please see *“Am I obliged to provide my Personal Data?”* below

2. On the basis of Flight School and/or Airbus’ legal obligations or in the public interest.

The related Flight School and/or 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 the related Flight School and/or Airbus in order to fulfil these obligations.

Who will receive your Personal Data?

- Symbiotics as online screening test provider working for or on behalf of Airbus and the relevant Flight School;
- The relevant Flight School from which you have accessed this Web Application;
- Airbus SAS and affiliates of Airbus, on a need-to-know basis for the purposes as outlined in this Privacy Notice;
- Our agents, service providers and advisers (e.g. Third party service providers and advisers providing the variety of products and services we need such as IT maintenance and support, compliance and security services, etc.);
- Other authorised third parties in connection with a reorganisation or sale of Airbus businesses and/or assets;
- Law enforcement or government authorities where necessary to comply with applicable law.

Will your Personal Data be transferred to a third country outside the European Economic Area (EEA)?

We process your Personal Data exclusively on Symbiotics Ltd secure computers located at its premises in the UK. On occasion Personal Data is transferred to the relevant Flight School and/or Airbus SAS or affiliates of Airbus, on a need-to-know basis, including entities outside the EEA. This transfer is subject to appropriate safeguards, and for Airbus through the legal framework of our Binding Corporate Rules which can be found on

our website www.airbus.com or viewed here [Airbus BCR's](#) or through alternative contractual frameworks where a third party is engaged to help us in providing web-services to you.

Which countries will your Personal Data be transferred to?

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. For Airbus, France and Germany are where most of our processing of personal information takes place and below is a list of countries where Airbus and the relevant Flight School may operate:

Algeria, Australia, Belgium, Brazil, Canada, Chile, China, Czech Republic, 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, Portugal, 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?

We store your Personal Data up to two years after the date of your FAST test. This delay may be extended in the case where we would need to fulfill some legal obligations, for instance, if we need to preserve particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation. At the end of this period, Symbiotics will delete all record of your Personal Data.

Security

We use technical and organisational 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 unauthorised persons.

Our security procedures are continually enhanced as new technology becomes available.

What are your rights and how to exercise them?

You may at any time exercise your data protection rights:

- **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 data is being processed.
- **Right to correct Personal Data:** You have the right to change 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 stop the processing of your data:** You have the right to restrict the processing of your Personal Data by Airbus, 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:** Under some circumstances provided by law, you have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit the Personal Data to another Data Controller.
- **Right to object and to withdraw consent:** please see the section below “*Am I obliged to provide my Personal Data?*”

To this effect, please contact Symbiotics in writing either by e-mail at the following address:

DataController@SymbioticsLtd.co.uk or by writing to the addresses below, enclosing a copy of a document evidencing your identity, who will inform the relevant Flight School and/or Airbus.

Symbiotics Ltd
Teme House
Whittington Road
Worcester
England
WR5 2RY

Am I obliged to provide my Personal Data?

You must provide us all the Personal Data mentioned above for your application process to the Airbus Pilot Cadet Training Programme. All the collected Personal Data is required for your application process, as we strictly minimize the amount of Personal Data we collect.

You can refuse or withdraw your consent at any time by contacting Symbiotics at DataController@SymbioticsLtd.co.uk who will inform the relevant Flight School and/or Airbus. In such a case, we unfortunately won't be able to continue processing your application. As a consequence, your access to the Airbus Pilot Cadet Training Programme will be compromised. For instance, if you withdraw your consent before we have come to a decision regarding your application, we won't be able to continue evaluating your profile; you would be disqualified in such a case.

Will profiling take place?

Profiling takes place in the context of your evaluation. More specifically, through our evaluation process, our online screening tool establishes your candidate profile by calculating grades that evaluates some of your aptitudes. Those grades are established using algorithms that automatically evaluate the answers you give during your FAST test.

In particular, we will generate 4 grades regarding:

- Your physical result,

- Your cognitive result,
- Your situation awareness result,
- Your ability to learn result

To what extent will decision-making be automated?

The decision of accepting or denying your admission is partially automated.

We process your Personal Data to evaluate your candidacy. All the data that has been generated through the profiling process can and will be taken into consideration to evaluate the suitability of your application. In particular we use the grades that have been generated to assess your profile. As a consequence, we decide whether we should accept or deny your application on the basis of these grades.

What are the consequences of our automated decision-making process?

As mentioned above, our automated decision-making process generates grades that will determine whether your application will be accepted or denied. In other terms, a consequence of the automated decision-making process will be the acceptance or the refusal of your application.

We regularly review our profiling and decision-making processes. These reviews include tests to ensure that our profiling and decision-making process remain fair, effective and unbiased.

You have the right to contest a decision, and to obtain specific information about the automated decision-making process involved in your evaluation. To do so please contact Symbiotics who will inform the relevant Flight School and/or Airbus (see *"How can I contact Symbiotics in respect of my Personal Data?"*).

Will we process special categories of data, such as health data?

By default, we do not process your health data. Nevertheless, in certain circumstances the profiling process could lead us to discover or deduce unintentionally some of your health data.

By taking the test process, you understand that the profiling process could lead us to discover health data about you, in particular concerning your mental or physical health, and abilities or disabilities. You explicitly consent that we process your Personal Data in this way, and understand that health data processing isn't our main purpose but could occur indirectly in some circumstances.

You have the right, at any moment, to question us about the data we've collected or generated about you through profiling (see *"What are your rights and how to exercise them?"*).

How can I contact Symbiotics in respect of my Personal Data?

You have the right to contest any decision taken by a solely automated decision-making process, express your point of view, and obtain more information about the way your Personal Data was processed.

Please contact us if you want to contest a decision, get more information about the profiling and decisional process we used to process your Personal Data, or if you want us to manually review any results of the profiling process that could have been taken by an automated process.

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 Symbiotics who will inform the relevant Flight School and/or Airbus, who will take care about your enquiries or complaints, at the following email address: DataController@SymbioticsLtd.co.uk or you can write to the address below:

Symbiotics Ltd
Teme House
Whittington Road
Worcester
England
WR5 2RY

Can I ask the competent authorities for assistance?

If you remain unsatisfied, then you have the right to apply directly to a Data Protection Supervisory Authority. Listed below are the two main European countries where Airbus operates and the relevant Supervisory Authority

FRANCE: [CNIL: Supervisory Authority France](#)

UK: [ICO: Supervisory Authority UK](#)

Cookies

WHAT ARE COOKIES?

Cookies are small files that may be downloaded on your device when you access and use our Web Application. They allow the Web Application to recognise your device and store information about your preferences or past actions. We use cookies to record the preferences of our users, to enable us to optimise the design of our Web Application. They ease navigation, and increase the user-friendliness of websites and applications. Cookies also help us to identify the most popular sections of our Web Application. This enables us to provide content that is more accurately suited to your needs and in doing so, improve our service. Cookies can be used to determine whether there has been any contact between us and your device in the past.

Only the cookie on your device is identified. Personal details can be saved in cookies, provided that you have consented. For example, cookies may be used to facilitate secure online access so that you do not need to enter your user ID and password again.

WHICH COOKIES DO WE USE?

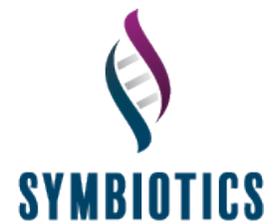
Please find below a table with specific information for each cookie that we may use on our Web Application:

NAME OF COOKIES	PURPOSE	RETENTION PERIOD
cookies-banner	Cookies policy approval.	Session duration
video-played	User experience, to show the intro video once only	+1 month

If you continue browsing this Web Application, we understand that you accept the use of cookies. You can revoke this consent at any time. You can also manage and control the cookies we use on our Web Application through the use of cookies tools.

HOW CAN YOU DISABLE OR DELETE COOKIES?

If you choose not to accept cookies, you can still access and use our Web Application. Most browsers automatically accept cookies. 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 delete cookies already on your device at any time. However, if you choose not to accept cookies that are strictly necessary for the provision of our services provided by our Web Application, it may result in a reduced availability of such services.



For the purpose of statistical analysis, we use analytics tools such as Adobe Analytics, or Google Analytics. You may object at any time to the collection and analysis of statistical data regarding your access to and use of our Web Application by contacting us using the “contact us” function within our Web Application. 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

We 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.