

Skyways Technics A/S
Privacy Policy
Last amended on 20.03.2025

1. General

It is important that you feel secure when you conduct business with us. We put great importance to privacy and the protection of personal data by using secure solutions for data processing. We implement appropriate technical and organisational measures to protect personal data against unauthorised access, unlawful processing or disclosure, accidental loss, alteration or destruction.

This privacy policy (**Privacy Policy**) describes how Skyways Technics A/S and/or its affiliates in various countries as listed [here](#) (all together - **Skyways** or **we**), process personal data obtained from our clients, suppliers, partners, candidates for employment, our [website](#) (**Website**) visitors, social media users and other data subjects.

Skyways (legal address: Lufthavnsvej 1 B, 6400 Sønderborg, Denmark) is the data controller of your personal data listed in this Privacy Policy.

This Privacy Policy describes what personal data we collect, how we obtain it, on what basis and for what purposes we use your personal data, how we use it, how long we store your personal data, who we share your personal data with, how we protect your personal data and your rights regarding your personal data.

We base our processing of customer data on the following principles: lawfulness, fairness, transparency, purposefulness and minimisation, accuracy, limitation of retention, reliability and confidentiality, accountability, data protection by design and by default. We are also committed to following the guidelines and recommendations of both by local Data Protection Authorities where our affiliates operate and the European Data Protection Board when implementing data protection requirements.

By using the Website or by providing Skyways with any information about yourself, you understand that your personal data will be used as set out in this Privacy Policy. You are not allowed to use the Website or provide your personal data to Skyways if you do not fully agree to the Privacy Policy. If you provide us with personal data of other persons, you should inform the persons concerned and familiarise them with this Privacy Policy.

Skyways will not sell or rent your personal data to anyone else.

We process your personal data in accordance with the applicable legislation, including the Regulation (EU) 2016/679 (**General Data Protection Regulation**) (also referred to in short as the **GDPR**) and other applicable laws.

2. Contact

You may contact Skyways on data processing issues at:

e-mail: hr@skywaystechnics.com

For questions relating to the processing of your personal data and the exercise of your data subject rights, please submit a written request. We will reply as soon as possible, but not later than within 30 calendar days. In exceptional cases, legislation allows us to extend the deadline for reply by 2 months. We ask you to verify yourself in the request so that we can verify the

identity of the person submitting the request/enquiry and to prevent the disclosure of the data to unauthorised third parties.

3. Definitions

Skyways uses the terms as defined in the General Data Protection Regulation which can be accessed [here](#).

Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to identification of the particular person, also constitute personal data.

4. Types of data and purposes for processing

Skyways will collect and process your personal data for the following purposes:

a. Provision of Skyways services and goods

Purpose: Provision of Skyways services and goods (e.g. aircraft repair and maintenance services, provision of spare parts); conclusion and performance of commercial agreements.

Data subjects: Clients of Skyways services and goods (natural persons) / representatives of the clients (legal persons), e.g. their employees.

Personal data:

Identification data (e.g. name, surname, position, name of the represented entity, date of birth);
Contact data (e.g. e-mail address, phone number);
Service data (e.g. service / purchase history, payment details);
Data related to provision of Skyways services (e.g. communication with us regarding the use of Skyways services).

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

Data sources: Data subject himself/herself, entity it represents and / or third parties, e.g. banks.

Legal ground(s) for processing: Such processing is necessary for the provision of Skyways services and goods to our clients (Article 6(1)(b) of the GDPR), our legitimate interest to administer our contractual relations, as well as to enter contractual relations with the legal entity you represent (Article 6(1)(f) of the GDPR) or to comply with legal requirements (e.g. accounting) (Article 6(1)(c) of the GDPR).

If you do not provide personal data required to comply with legal requirements (e.g. accounting) or maintain contractual relations, we may be unable to provide you with requested Skyways services.

Data retention: Data will be stored for up to 10 years following the end of relations with the user.

In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of

storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

b. Recruiting

Purpose: Processing personal data in relation with recruitment procedures.

Data subjects: Candidates to work at Skyways.

Personal data:

Identification data (e.g. name, surname, data provided in identity documents);

Image;

Image of identity document/ passport for criminal records check when applying for ID cards;

Information obtained from criminal record check;

Contact data (e.g. address, e-mail address, phone number);

Information about your education (e.g. data about your educational background and qualification, such as data from the documents certifying your education);

Information about your experience and qualifications (e.g. information about qualification improvement, working experience, candidate's assessment information, such as summaries of job interviews, results of conducted tests);

Other information provided by you in your CV, motivational letters, and other documents submitted;

Recommendations from your former and current employers;

Communication between you and Skyways.

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

We do not collect special categories data that disclose your racial or ethnic origin, political views, religious or philosophical beliefs or membership in trade unions, data about sexual life or sexual orientation.

Data sources: Data subject himself / herself (when applying for job in Skyways, signing an agreement, filling in a questionnaire and submitting requests) and other sources, such as agencies, internet portals, specialised job search and social networks, public sources and employees of Skyways if they recommended you to our job vacancy.

Legal ground(s) for processing: Such processing is necessary for the legitimate interest of Skyways to carry out the recruitment procedures (Article 6(1)(f) of the GDPR), to take steps at your request prior to entering into an employment contract (Article 6(1)(b) of the GDPR) or your consent (Article 6(1)(a) of the GDPR).

Processing of personal data relating to criminal convictions and offences or related security measures will be carried out only when the processing is authorised by EU or local law providing for appropriate safeguards for the rights and freedoms of data subjects.

If you do not provide the information required by Skyways to take steps at your request prior to entering into an employment contract, we may be unable to continue recruitment procedures with you.

Data retention: Skyways will store the personal data about the candidate for as long as the selection process to the specific position is taking place and 12 months after that. Based on

your consent such personal data may be stored for 36 months after receiving it or until your consent to process personal data for a longer period is revoked, whichever occurs first.

In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

c. Relations with suppliers & partners

Purpose: Commercial relations with our suppliers & partners, e.g. day-to-day business communication related to the services and (or) goods provided.

Data subjects: Our suppliers & partners (natural persons) or representatives of our suppliers & partners (legal persons), e.g. their employees.

Personal data:

Identification data (e.g. name, surname, position, name of the represented entity);

Contact data (e.g. e-mail address, phone number);

Payment data (e.g. information about payments to or from our suppliers & partners);

Subject matter and text of the communication with us.

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

Data sources: Data subject himself/herself, entity it represents and / or third parties, e.g. banks.

Legal ground(s) for processing: Such processing is necessary for the performance of the agreement between Skyways and the respective supplier or partner (Article 6(1)(b) of the GDPR), for the legitimate interest of Skyways to maintain the respective contractual relations (Article 6(1)(f) of the GDPR) or to comply with legal requirements (e.g. accounting) (Article 6(1)(c) of the GDPR).

If you do not provide the information required by Skyways to comply with legal requirements (e.g. accounting) or maintain contractual relations, we may be unable to carry out our contractual obligations and may terminate the respective agreements.

Data retention: Data will be stored for up to 10 years following the receipt of such data or termination of the respective agreement.

In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

d. Direct interactions

Purpose: Managing and answering the inquiries sent / provided to Skyways via e-mail, phone or via form provided on the Website.

Data subjects: Persons submitting / providing the abovementioned inquiries to Skyways.

Personal data:

Identification data (e.g. name, surname, position, name of the represented entity);
Contact data (e.g. e-mail address, phone number);
Subject matter and text of the communication with us.

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

Data sources: Data subjects themselves.

Legal ground(s) for processing: Such processing is necessary for the legitimate interest of Skyways to answer such inquiries (Article 6(1)(f) of the GDPR).

Data retention: Data will be stored for 2 years following the receipt of your query.

In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

e. Direct marketing

Purpose: Informing you about special offers, news or providing other information about Skyways services. Notifications on changes of our services are not considered direct marketing. Such notices are made for the purpose set out in Section 4 a. of this Privacy Policy.

Data subjects: Persons receiving the abovementioned communications from Skyways.

Personal data:

Identification data (e.g. name, surname, position at the represented entity, name of the represented entity);
Contact data (e.g. e-mail address, phone number);
Information about ordered Skyways services / goods.

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

Data sources: Data subjects themselves.

Legal ground(s) processing: Your consent to the processing of personal data for direct marketing purposes (Article 6(1)(a) of the GDPR), or our legitimate interest to inform our users about similar services of Skyways (Article 6(1)(f) of the GDPR). Based on our legitimate

interest to inform our customers about our similar services or goods, Skyways will process your certain contact details for direct marketing purposes only if all the following conditions are met:

- by using service or ordering goods from Skyways, you do not expressly object to the sending of direct marketing communications;
- each time we send a direct marketing message, you will be given the option to opt out from such direct marketing messages; and
- on this basis, your personal data will only be processed for the marketing of similar services or goods of Skyways itself.

You can unsubscribe from marketing messages at any time.

Data retention: Your personal data will be processed for the purpose specified in this section for 2 years from the date of its collection, or until you object to such processing of your personal data, or until your consent to process personal data for this purpose is revoked, whichever occurs first.

In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

f. Social networks

Purpose: Managing Skyways social media accounts (Facebook, Instagram, YouTube, LinkedIn) and communication with users of social networks.

Data subjects: Users of social networks (Facebook, LinkedIn, Instagram, YouTube) who interact with us through Skyways accounts.

Personal data:

Name of the profile on the social network, or name and surname;
Profile photo;

Public comments and other forms of interaction with Skyways social network accounts;
Content of the correspondence with Skyways.

Please note that Skyways may not process all the above data, and the scope of the processed data is determined on a case-by-case basis in accordance with the principle of data minimization.

Data sources: Data subjects themselves and respective social network.

Legal ground(s) for processing: Our legitimate interest to communicate with the users of our social network accounts (Article 6(1)(f) of the GDPR).

Data retention: Given that Skyways does not administer the above social networks, but only its accounts on these networks, and acts as a joint data controller together with the companies that administer the said social networks, please familiarize yourself with the information about the storage of your personal data in the privacy documents of the following social networks:

[Facebook](#)
[LinkedIn](#)

g. Functioning of the Website

For complete information about the tools we use on the Website (including cookies) and related data privacy issues, please see Section 6 of this Privacy Policy.

h. Legal claims and dispute resolution

Skyways may process all the above personal data for the purpose of presenting, enforcing, or defending against legal claims. For this purpose, we will process personal data based on our legitimate interest of presenting, enforcing, or defending against legal claims (Article 6(1)(f) of the GDPR). We will process your data for this purpose for 1 year following the end of the relevant legal proceedings (for example, the final decision of court or arbitration). In this section, the maximum expected data retention periods are specified, taking into account the legislation applicable both to respective Skyways entities and data subjects, where applicable, and the principle of storage limitation. Skyways always follows the principle of storage limitation and will process personal data no longer than necessary for the purposes for which the personal data is processed. In order to obtain more information about data retention periods, please contact Skyways via contact details specified above.

5. Your rights

Right of access: You have the right to obtain from Skyways a confirmation as to whether your personal data is being processed and to access the information about how Skyways processes your personal data, as well as to receive the copy of your personal data.

Right to rectification: You have the right to obtain from Skyways the rectification of your inaccurate personal data. You also have the right to have incomplete personal data completed, also by providing a supplementary statement.

Right to erasure ('right to erasure'): You have the right to obtain from Skyways the erasure of your personal data, if conditions established in Article 17 of the GDPR are met. Please note that Article 17(3) of the GDPR establishes some exceptions for such cases where processing is necessary. If they are applied in your case, we will inform you about them accordingly.

Right to restriction of processing: You have the right to obtain from Skyways restriction of processing if conditions established in Article 18 of the GDPR are met. Where processing has been restricted, such personal data shall, except for storage, only be processed with your consent or for the establishment, exercise, or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to data portability: You have the right to receive your personal data, which you have provided to Skyways, in a structured, commonly used, and machine-readable format and have the right to transfer this data to another controller, if:

- the processing is based on a consent or on a contract, and
- the processing is carried out by automated means.

You also have the right to have the personal data transferred directly from Skyways to such another controller, where technically feasible.

Right to object: You have the right to object at any time to processing of your personal data for the purposes of the legitimate interests of Skyways, including profiling based on those provisions. Skyways will no longer process the personal data unless we demonstrate

compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to withdraw the consent: If the processing of your personal data is based on your consent, you have the right to withdraw this consent at any time. Your withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. If you do not want to receive direct marketing communications from us, then you can unsubscribe via the “unsubscribe” link in our communications.

Right to lodge a complaint with a supervisory authority: You have the right to lodge a complaint with a supervisory authority in the EU member state of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR. Full list of supervisory authorities in the EU may be found [here](#).

Skyways would recommend and be grateful if you contact us before lodging a complaint to the relevant supervisory authority and express your concerns or questions to us. We will do our best to assist you with all your queries.

All the abovementioned requests shall be sent via e-mail address as provided above in the Privacy Policy. Skyways will examine your request to exercise the rights of the data subject within 1 month. This period may be extended, if necessary, for a further period of 2 months, considering the complexity and number of requests. In this case, Skyways will notify you of any such extension within 1 month of receipt of the request, together with the reasons for the delay. If, upon the receipt of a request, we have suspicions regarding your identity, we have the right to request additional information necessary to confirm your identity.

6. Cookies and other tracking technologies

Like many other websites, the Website use cookies and other tracking technologies.

“Cookies” are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our Website and deliver a better more personalised service.

We process strictly necessary cookies based on Skyways legitimate interest to improve the Website and make it easy and comfortable to use for visitors (Article 6(1)(f) of the GDPR). Other cookies (e.g. statistics, preference, marketing) are only used upon receiving your consent (Article 6(1)(a) of the GDPR). Our Website provides functionality by which you are able to control cookies used on our Website.

We use the following cookies:

| Cookie name | Type | Provider | Expiry |
|--------------------|---------------|----------------------|------------------|
| _ga_XG3Z9TZZ9C | Analytics | .skywaystechnics.com | 2 years |
| ga | Analytics | .skywaystechnics.com | 2 years |
| CONSENT | Analytics | .youtube.com | 2 years |
| VISITOR_INFO1_LIVE | Advertisement | .youtube.com | 5 months 27 days |

| | | | |
|-----|---------------|--------------|---------|
| YSC | Advertisement | .youtube.com | session |
|-----|---------------|--------------|---------|

Google Analytics

Skyways uses cookies from Google Analytics to measure the target traffic on the website. You can deselect cookies from Google Analytics [here](#). Google Analytics cookie is stored for 2 months on your browser. More information about Google Analytics cookies may be found [here](#).

Cookie control

You may also block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or part of our Website.

Also, if you need more information about cookies, visit [here](#). On this website you may find detailed, independent information on how to disable cookies through your browser preferences and how to remove cookies that are already on your computer.

7. Automated decisions and profiling

An automated decision is a decision based on automated processing that is carried out without human intervention in order to make the process faster and smoother. Skyways may make automated decisions when processing personal data, for example:

- for the purposes of conducting background checks on the sale of goods and the provision of services on credit terms, where we process relevant information about your payment behaviour and background from Skyways' information systems as well as from public databases (official notices, information disclosed by bailiffs and other official registers and publications, e.g. commercial register, court databases);
- for the purposes of automatic notifications in the framework of debt collection procedures and for the limitation of the services provided, as provided for in contracts and by law.

The purpose of marketing profiling is to develop different customer segments, types or profiles, which allow to make offers and services tailored to each customer. For profiling purposes, we may analyse, for example, customer service usage data, location, and behavioural patterns, using a variety of internationally accepted statistical analysis techniques appropriate to the specific case.

You have the right to ask for further clarification and to object at any time to automated decisions concerning the customer by informing Skyways to the contact as stated in this Privacy Policy.

8. Disclosure of personal data to third parties

Any information that you provide may be shared with third parties (data processors), which provide Skyways with services and act on its behalf (e. g. companies providing marketing / advertising services, IT service providers, accounting service providers, etc.). Skyways ensures that processing of personal data by such third parties will be based on a legitimate legal ground and will be performed in accordance with lawful instructions of Skyways and in compliance with the GDPR and other legal requirements.

If you apply for recruitment by Skyways, Skyways may share your personal data within Skyways company group, where this is necessary (e.g. one Skyways entity organizes recruitment procedures on behalf of another Skyways entity). If you have authorised third

parties to legally represent you on the basis of an authorisation, those persons are considered third parties involved in the data processing.

Specifically, Skyways may share personal data with the following categories of third parties (data processors, data recipients or individual data controllers) as necessary:

- our affiliates, i.e. subsidiaries, joint venture partners or parent companies (if needed for proper internal administration of the group (e.g. accountability));
- courts, arbitrators, mediators, opposing party and their lawyers (if needed for the legal proceedings),
- police, law enforcement authorities, tax authorities, other government, or municipal institutions;
- our professional advisers such as lawyers or accountants (if needed for the protection of our legitimate interests);
- service providers, which provide information technology and system administration, marketing, accounting, postal or courier or other services;
- when performing business transactions (sale of Skyways, its assets (part thereof) or its shares (part thereof), merger or division of Skyways, etc.), to potential or final acquirers (their representatives),
- persons performing audit of Skyways or otherwise participating in the relevant business transaction;
- other persons or entities (if needed to provide you with Skyways services or goods as effectively as possible).

Skyways will not transfer your personal data to third countries (countries outside the EU/EEA), unless this is deemed necessary. This may be the case if Skyways must involve external parties, e.g. IT providers, or one Skyways entity organizes recruitment procedures on behalf of another Skyways entity, located outside the EU/EEA. Skyways makes every effort to ensure that such data transfers comply with the requirements of the GDPR and implements appropriate measures to ensure that your personal data remains protected and secure, such as Standard Contractual Clauses (SCCs). You may find more about such measures by contacting us directly via e-mail as indicated in this Privacy Policy.

9. Security of your personal data

We use up-to-date physical, organisational and IT security measures to ensure the secure processing of data. These measures include the protection of employees, IT infrastructure, as well as office buildings and technical equipment. These measures are primarily aimed at threat prevention and risk mitigation. To ensure compliance with the measures, internal procedures have been established for mandatory compliance.

Your personal data will be processed in accordance with the requirements of the GDPR and other applicable legal acts. When processing your personal data, we implement organizational and technical measures that ensure the protection of personal data against accidental or unlawful destruction, alteration, disclosure, and any other unlawful processing.

Although Skyways aims to protect your personal data, the transfer of data via the internet is not 100% secure, so we cannot fully guarantee secure transfer of data via the internet.

10. Changes

Skyways may, at its sole discretion, change, modify, add, or remove any portion of the Website, its content and / or this Privacy Policy, in part or in its entirety, at any time based on new functions or regulations. We will keep the privacy notice up to date and always available on our [Website](#).

Any changes to this Privacy Policy are effective from the date of their publication and (or) communication via contact details. You undertake to review this Privacy Policy periodically to become aware of any changes. If material changes of the Privacy Policy occur and we have your contact details, we will inform you about such changes separately.

11. Disclaimer

The Website may include links to the websites that are owned, published, and maintained by any third party. Skyways does not undertake any responsibility for the accuracy or reliability of any such third-party websites.

The Website and its contents are provided for general information purposes only. Skyways assumes no responsibility for the information and material on the Website.

To the extent permissible by applicable laws Skyways is not responsible or liable for any matter relating to you or any third parties accessing or using this Website and its contents.

12. Details of the Website and ownership

The Website, its content, code, design, domain name, all copyrights, trademarks, databases, corporate names and other intellectual property or other property related to the Website, or its contents are fully owned by Skyways and / or licensors and / or content providers and are protected by national and international intellectual property laws and other legislation.

Unless expressly permitted by Skyways, you have no right, in any form and by any means, to copy, capture, reproduce in any form or manner, launch, publish, transfer, sell, translate, reprocess, submit, licence, modify, create derivative works from or based upon, republish, edit, transmit, retransmit or otherwise make public, publicly perform or display, frame, distribute or use, in part or in its entirety, the Website, its content or code.