



Global Data Privacy Policy

GP-LEG-22

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1. INTRODUCTION

The purpose of the Global Data Privacy Policy is to establish guidelines for employees within Ontic including the Group companies set out in Annex 1. This policy is designed to describe the processing of Personal Data provided by Ontic (referred to as “Ontic”, “we”, “us”, “our” etc.).

We follow this Global Data Privacy Policy in accordance with applicable law in the places where we operate. **In some cases, we will provide additional Privacy Notices specific to certain regions or categories of data. Any such additional Privacy Notices are to be read in conjunction with this policy.**

The following individuals are responsible for this policy:

Role	Name	Contact
Data Protection Officer	N/A	N/A
Data Privacy Lead	Ben Walker	privacy@ontic.com

2. REVISIONS AND AMENDMENTS

Rev	Date	Reason for change	Revised by
A	09-OCT-2023	Initial Issue	Z. Rowe
B	31-OCT-2024	Annual Review	Z. Rowe
C	09-OCT-2025	Annual Review	Z. Rowe
Next review due October 2026			

3. PURPOSE AND SCOPE

- 3.1.1 This Global Data Privacy Policy applies to all Personal Data we process regardless of how or where it is stored or whether it relates to past or present employees,

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workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.

4. POLICY PRINCIPLES

- 4.1 The confidentiality, security and the integrity of the information we collect as a business is exceptionally important to us. We have implemented technical and organisational measures designed to protect the information we control. Although no security measures are ever perfect or impenetrable, we make it a business priority to maintain the confidentiality, security and integrity of the information we control.

5. TYPES OF PERSONAL DATA COLLECTED

- 5.1 In the conduct of our business activities we collect various data which is in part or in whole Personal Data. In particular, we collect the following:
- 5.1.1 **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, image and gender.
 - 5.1.2 **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - 5.1.3 **Financial Data** including banking and payment details.
 - 5.1.4 **Transaction Data** includes details about payments to and from you and other details of products and services purchased from us.
 - 5.1.5 **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites and applications.
 - 5.1.6 **Usage and Profile Data** includes information about how you use our website, products and services.
 - 5.1.7 **Marketing and Communications Data** includes preferences in receiving marketing from us and our third parties and communication preferences.
 - 5.1.8 **Photographic Data** includes still or video images captured by cameras or readers on or around our physical properties.
 - 5.1.9 **Employment Data** includes education and employment history, employment references, data concerning nationality, a Data Subjects right to work in a particular country or role and criminal records data.

6. HOW WE COLLECT PERSONAL DATA

We use different methods to collect data including through:

- **Direct interactions.** A Data Subject may give us identity, contact and financial data by corresponding with us by post, phone, email or otherwise.

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This includes personal data you provide when:

- requesting information from us (including marketing material);
 - purchasing, returning, requesting or exchanging a product or service from us;
 - seeking to supply products or services to us;
 - applying for a job with us;
 - giving us feedback or contacting us; or
 - if you visit one of our sites, from completion of visitor documentation and the CCTV system managed by us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see any relevant cookies policy on our websites for further details.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including:
 - Technical data from the following parties:
 - a) analytics providers such as Google;
 - b) advertising networks based; and
 - c) search information providers.
 - Contact data and financial data from providers of technical and payment services.
 - Identity data and contact data from publicly available sources.
 - Identity data, contact data and employment data from recruitment consultants and job boards/CV libraries.

We acquire information from other trusted sources to update, verify or supplement certain information, such as when we validate postal address information using third party services. Applicable law may require a Data Subject to provide express consent before we can update, verify or supplement certain information in this manner.

7. SHARING OF INFORMATION WITHIN THE ONTIC GROUP

The relevant Ontic group company that is the Data Controller for any Personal Data is responsible for such and may use such in accordance with this Global Data Privacy Policy.

Other Ontic group companies may access such information where they perform services on behalf of the relevant Data Controller in accordance with this Global Data Privacy Policy. Any intra-group processing of Personal Data shall only be conducted in accordance with reasonable safeguards, these may include controls such as binding corporate rules or standard contractual clauses approved by the

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relevant governmental or regulatory body (e.g. the UK ICO's International Data Transfer Agreement for the transfer of personal data from the UK and/or the European Commission's Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 as set out in the Annex to Commission Implementing Decision (EU) 2021/914).

8. SHARING OF INFORMATION WITH THIRD PARTIES

We will not share Personal Data with Third Parties unless:

- we are legally obligated to do so or do so to comply with legal process;
- the relevant Data Subject has allowed us or directed us to share their Personal Data with such Third Parties;
- the Third Parties are performing services on our behalf and such Third Parties are subject to reasonable safeguarding obligations in respect of the relevant Personal Data; or
- we are disclosing Personal Data in connection with the sale of a business, to enforce or protect our rights and/or property and/or to ensure the safety and security of our staff, visitors and third parties.

9. HOW WE STORE PERSONAL DATA

We will retain Personal Data for the length of time needed to fulfil the purposes outlined in this Global Data Privacy Policy, or in any applicable Privacy Notices, unless a longer retention period is required or permitted by law.

10. DATA SUBJECT RIGHTS

Notice to residents of the state of California (USA): If you are a resident of the state of California, you may have certain additional privacy rights which are documented in Ontic's California Consumer Privacy Policy and Notice at Collection (US-LEG-01) that is available under the 'Resources' section of the Ontic website (<http://www.ontic.com>).

Notice to UK & EEA residents: If you are a UK or EEA resident, you may have certain additional privacy rights which are documented in Ontic's General Data Privacy Notice (UK-LEG-04) that is available under the 'Resources' section of the Ontic website (<http://www.ontic.com>).

11. CHANGES TO THIS DATA PROTECTION POLICY

We reserve the right to change this Global Privacy Policy at any time without notice so please check regularly to obtain the latest copy of this Global Privacy Policy when engaging with us.

This Global Data Privacy Policy does not override any applicable national data privacy laws and regulations in countries where Ontic operates.

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12. DEFINITIONS AND ACRONYMS

Data Controller	The person or organisation that determines when, why and how to process Personal Data.
Data Privacy Lead	The person appointed to be responsible for data protection compliance where no DPO has been appointed.
Data Protection Officer (DPO)	The person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the Ontic Data Privacy Lead with responsibility for data protection compliance.
Data Subject	A natural living, identified or identifiable individual about whom we hold Personal Data.
Personal Data	Any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data excludes anonymous data or data that has had the identity of an individual permanently removed. Personal Data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
Privacy Notices	Separate notices setting out information that may be provided to Data Subjects when Ontic collects information about them. These notices may take the form of general privacy notices applicable to a specific group of individuals or they may be stand-alone, one-time privacy notices covering processing related to a specific purpose.
Third Party or Third Parties	Anyone outside of the Ontic group, to include individuals and businesses.

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Annex 1 – Ontic Group companies that this policy applies to

Territory	Ontic Group Company
US	Ontic Engineering & Manufacturing Inc
	Centroid, Inc.
	Firstmark Aerospace Corp.
	Aircraft Belts, Inc.
	Twin Commander Aircraft, LLC
UK	Ontic Engineering & Manufacturing UK Limited
	AP Filtration Limited
Singapore	Ontic Engineering & Manufacturing Asia Pacific Pte Limited