

CHC EU Privacy Notice

Introduction

1. CHC is committed to processing personal data responsibly and in compliance with the applicable data protection laws in all countries in which CHC operates. This GDPR Privacy Notice (“Privacy Notice”) covers CHC’s entities based in the European Economic Area (“EEA”) and describes what to expect when CHC collects Personal Information about you and how we may use your personal data.

Contact details

2. For each EEA country in which CHC does business, CHC is the controller for the personal information we process, unless otherwise stated. Contact information for CHC’s European operations are listed in Annex A to this Privacy Notice.

3. CHC has a designated Data Protection Officer (DPO) who is responsible for:
- monitoring compliance with this Privacy Notice, applicable data protection laws, and data protection policies;
 - providing advice on data protection matters upon request;
 - acting as the point of contact for individuals relating to personal data and data protection;
 - acting as the point of contact for the supervisory authorities.

If you have any questions regarding this Privacy Notice, please contact the DPO at dataprotectionofficer@chcheli.com

Personal Information We Collect and How We Use It

4. The types of Personal Information we may collect (directly from you or from Third Parties) depend on the nature of the relationship that you have with CHC and the requirements of applicable law. We collect only information relevant for the purposes of processing. We do not engage in automated decision making when processing your Personal Information. Below are the legal bases for Processing Personal Information, some of the ways we collect information, and how we use the information.

| Data Subject categories | Purpose of processing | Types of data | Legal Basis for processing |
|-------------------------------|--|--|---|
| Offshore Oil & Gas Passengers | Enable flight planning including the generation of flight manifests, ensure smooth operations and enable check-in and security procedures so CHC meets its contractual and legal obligations | Basic identifiers, employer and destination, body weight & dimensions Images captured through video surveillance in limited locations | Contractual obligations, legal/regulatory requirements, legitimate interest to ensure safe and secure operating environment |
| Customers | To support requirements of contract management | Basic identifiers, business contact details | Contractual obligations, |

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| | processes and contract delivery, relationship management, marketing activity and bid submissions | including job title, contractual agreements, customer relationship data, information relating to customer's employees or contractors | Legitimate interest as part of CHC's contract and relationship management with its customers and to develop and grow the business |
| Search & Rescue and other related flights – Passengers & associated individuals | To provide medical care, including the provision of emergency healthcare, to improve operational effectiveness and quality of care for future rescues and to meet regulatory compliance | Basic identifiers, date of birth, gender, other biographical data, health/medical information | To protect vital interests of individual, performance of task in public interest, legal obligations and legitimate interest to improve performance. |
| Suppliers | <ul style="list-style-type: none"> • Generally managing Supplier information; • Responding to questions and requests; • Verifying supplier identity; • Communicating about supplier accounts and activities; • Processing payments for products or services purchased by CHC; • Developing new services, products, and processes; and • Further purposes disclosed at the time suppliers provide Personal Information, or otherwise with consent of the Supplier | Basic identifiers, job title contact details, invoicing and other payment information, agreements with CHC | Contractual obligations, legal/regulatory requirements, legitimate interest to support the business in managing its operation through an effective supply chain. |
| Visitors | <ul style="list-style-type: none"> • To verify your identity • To provide access to CHC facilities and systems • For security and other safety purposes • to communicate with you regarding your visit • To provide information we believe may be of interest to you, including CHC's services, and for purposes disclosed at the time you provide Personal Information, or otherwise with your consent. | <p>Basic identifiers, contact details, business or company affiliation, government identification (verification only), car registration</p> <p>If you connect to CHC Guest Wi-Fi we record your device's mac address and we maintain a log of sites visited. Images captured through video surveillance</p> | Legitimate interest for the purpose of security and safety |

Where CHC processes personal data to meet its statutory or contractual requirements,

or as a requirement to enter into a contract individuals are required to provide this information. Without this information CHC will not be able to enter into a contract with you or may not be able to meet its legal obligations. If you have any particular concerns regarding this please contact our Data Protection Officer.

Legitimate Interest for Processing

Where CHC has a legitimate business interest in processing your personal data, we have carefully balanced your interest with the interests of CHC; to manage the delivery of our services to our customers as effectively and efficiently as possible; to manage the safety and security of passengers, customers, our supply chain, visitors and employees when visiting CHC facilities or using a CHC service; to develop and build our business; to manage our statutory and regulatory obligations; and defend itself against legal claims,

Information We Share

5. CHC does not sell your Personal Information. It only shares data as described in this Privacy Statement. CHC may share Personal Information (i) with our service providers and consultants for internal business purposes or to provide you with a service that you have requested; (ii) with our customers if you are an employee or contractor for that customer; or (iii) in the case of search and rescue, to other Third Parties including other emergency services and medical health providers. CHC requires its service providers to agree in writing to maintain the confidentiality and security of Personal Information they maintain on CHC's behalf. Specifically, CHC requires service providers (a) to provide at least the same level of protection as required by GDPR; (b) to agree not to use Personal Information for any purpose other than the purposes for which CHC retained them; and (c) to notify CHC if they make a determination that they can no longer comply with CHC's requirements.

6. CHC may also be required to disclose information about you in the following circumstances:

- a. If we are required to do so by law, court order, or legal process
- b. In response to lawful requests by public authorities, including to meet national security or law enforcement requirements
- c. Under the discovery process in litigation or arbitration
- d. To enforce CHC policies, contracts, or other rights
- e. To collect amounts owed to CHC
- f. When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation or prosecution of suspected or actual illegal activity
- g. If we believe in good faith that disclosure is otherwise necessary or advisable
- h. In addition, from time to time, server logs may be reviewed for security purposes—e.g., to detect unauthorized activity on the CHC website. In such cases, server log data containing IP addresses may be shared with law enforcement bodies, contractors, or consultants so that they may identify users in connection with their investigation of the unauthorized activities.

7. We reserve the right to disclose or transfer any information we have about you in the event of; a proposed or actual reorganization, sale, lease, merger, joint venture, assignment, amalgamation, or any other type of acquisition, disposal, or financing of all or any portion of CHC or of any of our assets (including should CHC cease to trade, become insolvent, or enter into receivership or any similar event occur). Should such an event take place, we will endeavour to direct the transferee to use Personal Information in a manner consistent with this Privacy Statement.

Data Transfers

8. Your Personal Information may be transferred to other CHC offices, data centres, and servers in Europe or outside of the EEA. CHC takes steps to ensure that appropriate technical and organizational security measures and safeguards are applied when transferring personal information outside of the EEA and that privacy rights outlined in this Policy are preserved. CHC has established Standard Contractual Clauses (SCC) that have been recognized by EU Data Protection Authorities as providing an adequate level of protection to the Personal Information we process globally. You may request a copy of these SCC through CHC's Data Protection Officer.

9. CHC will take steps designed to comply with all applicable local laws when Processing Personal Information, including any local law conditions for and restrictions on the transfer of Personal Information. In addition, CHC's United States subsidiaries have subscribed and will adhere to the principles set forth in the EU-US Privacy Shield Framework, which has been determined to provide adequate safeguards for the transfer of personal data from the EEA to the United States of America. More information about the Privacy Shield can be found at www.privacyshield.gov, and CHC's Privacy Shield certification can be found at www.privacyshield.gov/list. CHC's Privacy Shield compliance is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Individual Rights

10. Under data protection law, you may have a number of rights relating to the processing of your Personal Information. You may exercise these rights by contacting CHC's DPO at dataprotectionofficer@chcheli.com:

- a. The right to be informed regarding what personal data CHC processes;
- b. The right to receive a copy of the data;
- c. The right to correct and update any inaccurate data;
- d. In certain circumstances, the right to request that certain data be deleted;
- e. In certain circumstances, the right to restrict the use of your data;
- f. In certain circumstances, the right to object to the processing of your data;
- g. In certain circumstances, the right to be given the data in machine readable format for transmission to another data controller;
- h. The right to not be subject to decisions of a legal or significant nature made solely on the automated processing of your data; and
- i. The right to withdraw your consent to the processing of your personal data where applicable without affecting the lawfulness of processing preceding the request to withdraw consent.
- j. The right to lodge a complaint with the applicable supervisory authority.

11. Although CHC makes good faith efforts to provide individuals with access to their Personal Information, to the extent permissible by applicable law, there may be circumstances in which CHC is unable to provide access to Personal Information, including but not limited to:

- a. Where the information contains legal privilege,
- b. Would compromise others' privacy or other legitimate rights,
- c. Where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or
- d. Where the information is commercially proprietary.

If CHC determines that access should be restricted in any particular instance, we will try to provide you with an explanation regarding why that decision has been made. To protect your privacy, CHC will take steps to verify your identity before granting access to or making any changes to your Personal Information.

Retention

14. CHC has a comprehensive Record Retention Policy which mandates how long records, including personal data, must be retained. The retention period is determined by legislation and business requirements. In most cases we will hold your data for up to 3 years after last contact, unless we have a legitimate business need or a regulatory obligation which requires us to hold this data for a longer or shorter period.

Security

15. CHC maintains administrative, technical, organisational, and physical safeguards designed to protect Personal Information that is received against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Changes to this Privacy Statement

16. CHC may update this Privacy Statement from time to time. If there are any material changes to this Privacy Statement, CHC will notify you by email, by means of a notice on our website, or as otherwise required by applicable law. CHC encourages you to review this Privacy Statement periodically to be informed regarding how CHC is using and protecting your Personal Information. Any changes to this Privacy Statement take effect immediately after being posted or otherwise provided to you by CHC.

Annexes

A. CHC European Operations

CHC European Operations

| Company & Registered Address | |
|---|--|
| <p>CHC Helikopter Services AS Flyplassvegen 250 4055, Sola Norway</p> <p>CHC Helicopters Netherlands B.V. Luchthavenweg 18 1786 PP DEN HELDER Netherlands</p> <p>CHC Scotia Limited c/o CMS Cameron McKenna LLP, 78 Cannon Street, London, EC4N 6AF, UK</p> | <p>CHC Ireland Designated Activity Company c/o McCann Fitzgerald Riverside One, Sir John Rogerson's Quay, Dublin 2, Ireland</p> <p>CHC Hoofddorp BV Luchthavenweg 18, 1786 PP Den Helder, The Netherlands</p> <p>EEA Helicopter Operations BV Luchthavenweg 18, 1786PP Den Helder, The Netherlands</p> |
| <p>Heli-One (Netherlands) BV Fokkerweg 300 (Building 15) 1438 AN, Oude Meer, The Netherlands</p> <p>Heli-One (UK) Limited CHC House, Howe Moss Drive, Kirkhill Industrial Estate, Dyce, Aberdeen, AB21 OGL, United Kingdom</p> | <p>Heli-One (Poland) Sp. Z O.O. Jasionka 947, 36-002 Jasionka, Poland</p> <p>Heli-One (Norway) AS Stavanger Lufthavn Sola, 4055 Sola, 1124 Sola, Norway</p> |