

Applicant Data Privacy Notice

- **When to use:** For applicants who are applying for a position at a Darchem Engineering Ltd entity located in the UK.
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As part of your application to a Darchem Engineering Ltd entity located in the UK (the "**Company**"), we provide you with this Applicant Data Privacy Notice ("**Notice**") to explain our practices regarding the collection, use, and other processing of certain individually identifiable information ("**Personal Data**") about job applicants or other potential employees, located in the UK and/or who apply for a position at the Company. The Company acts as a data controller with respect to such Personal Data, as described in more detail below.

1. What Personal Data do we collect?

To the extent authorised by applicable law, the Company collects and processes the following categories of Personal Data in consideration of your potential employment at the Company:

- **Master data:** name, contact information (home address, private mobile number, private email address), date of birth and/or location, nationality, citizenship, gender, work/residence authorization documentation (e.g., visas, permits), and other data collection permitted or required by local law; and
- **Employment qualifications data:** credit history (for functions where this is permissible by law), professional qualifications, previous addresses, prior employment history, current and past directorships held by you, education history (such as education levels, degrees), curriculum vitae (including education, qualifications, competence and functional and leadership experience), and professional or personal references, cover letter, training, language skills, honors or awards, hobbies/interests (if voluntarily disclosed by you);

In addition to Personal Data mentioned above, we also collect, use and otherwise process the following special category of Personal Data about you ("**Sensitive Personal Data**"):

- **Sensitive Personal Data:** depending on the position you are applying for, where permitted

and in accordance with applicable law, background information for security screenings including data relating to criminal convictions and offenses, drug and alcohol test results, and trade union membership data.

Personal Data and Sensitive Personal Data will be collected either directly from you or from third parties (e.g., people you have named as your references, previous employers, schools, public authorities, or public resources), subject to the requirements of applicable law.

The provision of Personal Data and Sensitive Personal Data as described in this Applicant Data Privacy Notice is partly a statutory requirement, partly a contractual requirement under the terms of our recruiting website, and partly a requirement to carry out the recruitment and hiring process with you. In general, you are required to provide the Personal Data and Sensitive Personal Data, except in limited instances when we indicate that certain information is voluntary. Not providing your Personal Data may prevent the Company from carrying out recruiting and hiring activities that impact your potential employment with us.

2. For what purposes and on what basis do we use and process Personal Data?

The Company uses and processes Personal Data, including Sensitive Personal Data where applicable, to carry out the recruiting and hiring process. We use and process the following categories of Personal Data for the following purposes ("**Recruiting Purposes**"):

PERSONAL DATA		
Recruiting Purposes	Categories of Personal Data Involved	Legal Grounds
Recruiting and hiring activities , including administering your recruitment, background checks and security screening, making a hiring decision (including assessing qualification and tracking candidates during the application process, and	Master data, and Employment qualifications data	<ul style="list-style-type: none"> • The processing is necessary to take steps at your request prior to entering into a contract with you. • The processing is necessary for compliance with a legal obligation to which the Company is subject. • The processing is necessary

carrying out interviews), and completing the hiring process in case you should be offered and accept a position with the Company (including activities related to on-boarding and the new hire process).		for the purposes of the legitimate interests pursued by the Company - as stated in the first column.
Complying with applicable laws and employment-related requirements , along with the administration of those requirements, such as employment and immigration laws.	Master data, and Employment qualifications data	<ul style="list-style-type: none"> • The processing is necessary to take steps at your request prior to entering into a contract with you. • The processing is necessary for compliance with a legal obligation to which the Company is subject. • The processing is necessary for the purposes of the legitimate interests pursued by the Company - as stated in the first column.

We use and process the following categories of Sensitive Personal Data for the following purposes ("**Recruiting Purposes**"):

SENSITIVE PERSONAL DATA		
Recruiting Purposes	Categories of Personal Data Involved	Legal Grounds
Conducting security screenings where required by applicable law	Sensitive Personal Data	<ul style="list-style-type: none"> • The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company or you in the field of employment and social security and social protection law. • The processing is necessary

		<p>for reasons of substantial public interest, on the basis of Union or Member State law.</p> <ul style="list-style-type: none"> • The processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.
<p>Complying with applicable laws and employment-related requirements, along with the administration of those requirements</p>	Sensitive Personal Data	<ul style="list-style-type: none"> • The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company or you in the field of employment and social security and social protection law. • The processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law. • The processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.

3. Under what conditions is Personal Data transferred to other recipients?

The Company may transfer Personal Data, including Sensitive Personal Data, on a need-to-know basis to third parties for the Recruiting Purposes as described above as follows:

- **Transdigm Group Inc.** Since management, human resources, accounting, tax, legal, compliance and audit responsibilities partially rest with Transdigm Group Inc, our parent in

the United States we may transfer Personal Data to, or otherwise allow access to such data by Transdigm Group Inc. (as a controller), and possibly [other group entities](#), which may use, transfer, and otherwise process the Personal Data for the following purposes: recruiting and hiring activities, addressing immigration requirements, and completing background checks. However, if you would prefer to limit your application to a specific entity(ies), please contact us as indicated below.

- **Regulators, authorities, and other third parties.** As necessary for the Recruiting Purposes described above, Personal Data may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), or independent external advisors (e.g., auditors).
- **Acquiring entities.** If the business to which you applied is sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your Personal Data may be transferred to the new entity or potential new entity as part of the transfer itself or as part of an initial review for such transfer, subject to any rights provided by applicable law, including that of the jurisdiction where the new entity or potential new entity is located.
- **Data processors.** As necessary for the Recruiting Purposes described above, Personal Data may be shared with one or more parties, whether affiliated or unaffiliated, to process Personal Data under appropriate instructions ("**Data Processors**"). Such Data Processors may carry out instructions related to IT system support, compliance (e.g., security screening), and other activities, and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the Personal Data, and to process the Personal Data only as instructed.

The recipients of Personal Data identified in this section may be located inside or outside of the European Economic Area ("**EEA**"). Recipients located outside of the EEA might be located in countries that do not offer an adequate level of data protection from an EEA data protection law perspective, such as the United States. To the extent required by applicable law, the Company will: (i) address any applicable requirement to assure an adequate level of data protection before transferring Personal Data by ensuring the execution of appropriate data transfer agreements based on the European Commission model clauses, or confirming other controls (e.g., Privacy Shield); and (ii) require that Personal Data only be made available to individuals within the recipient entity on a need-to-know basis for the relevant Recruitment Purposes described above. You can request a copy of the appropriate safeguards by contacting us as set out in the Questions section below.

4. For how long does the Company retain my Personal Data?

Your Personal Data including Sensitive Personal Data, is stored by Darchem Engineering Ltd, and/or our service providers, for the performance of our obligations and to achieve the purposes for which the Personal Data was collected, in accordance with applicable data protection laws, and our record retention policies. When we no longer need to use your Personal Data, we will remove it from our systems and records and/or take steps to properly render it unintelligible so that you can no longer be identified from it (unless we need to keep your Personal Data in order to comply with legal or regulatory obligations to which Darchem Engineering Ltd is subject, including the need to support or defend a legal claim that is not yet barred by the applicable statute of limitations).

If you accept an offer from the Company, your Personal Data will be retained for the duration of your employment with the Company and as necessary in accordance with applicable law and the Company record retention schedules.

5. What Are My Rights?

If you have declared your consent regarding certain types of processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Pursuant to applicable data protection law, you also have the following rights in relation to your Personal Data, including Sensitive Personal Data: (i) request access to your Personal Data; (ii) request rectification of your Personal Data; (iii) request erasure of your Personal Data; (iv) request restriction of processing of your Personal Data; (v) request data portability of your Personal Data; and/or (vi) object to the processing of your Personal Data. Please note that your rights may vary depending on applicable data protection law.

- (i) Right of access: Under certain circumstances, you have the right to obtain from us confirmation as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to such Personal Data. The access information includes – *inter alia* – the purposes of the processing, the categories of Personal Data concerned, the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, the sources of the Personal Data, the duration of retention, and the appropriate safeguards put in place to safeguard the Personal Data in case of transfer outside of the EEA. However, this is not an absolute right and the interests of other individuals may restrict

your right of access.

You have the right to request a copy of the Personal Data. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

- (ii) Right to rectification: Under certain circumstances, you have the right to obtain from us the rectification (i.e., correction) of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
- (iii) Right to erasure (right to be forgotten): Under certain circumstances, you have the right to obtain from us the erasure of Personal Data concerning you. In such cases, we will take steps to erase, or render permanently unintelligible, such Personal Data.
- (iv) Right to restriction of processing: Under certain circumstances, you have the right to obtain from us restriction of processing of your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes. However, as the Company processes and uses your Personal Data primarily for purposes of entering into a contractual employment relationship with you, in case you object to (and request restriction of) the processing of your personal data on grounds relating to your particular situation, the Company will in principle have a compelling legitimate interest for the processing which will override your objection/restriction request, unless your request, relates to marketing activities (which generally do not apply in the employment context).
- (v) Right to data portability: Under certain circumstances, you have the right to receive the Personal Data about you that you have provided to us, in a structured, commonly used and machine-readable format so you can transmit this Personal Data to another entity.
- (vi) Right to object

Under certain circumstances, as provided by applicable law, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data.

If you have a right to object and if you exercise this right, your Personal Data will no longer be processed for such purposes by us unless the Company demonstrates compelling legitimate grounds pursuant to the General Data Protection Regulation ("GDPR"). You may exercise this right by contacting us as stated in the Questions section below.

This is not an absolute right and does not apply in certain situations, such as when processing is necessary to perform a contract, to comply with applicable EU or Member State law, or to defend legal claims.

(vii) Right to not be subject to a decision based solely on automated processing: Under certain circumstances, you have the right to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Where such right applies, we will allow you to request human intervention, express your point of view, and/or contest the decision.

To exercise your rights please contact us as stated in the Questions section below.

You also have the right to lodge a complaint with the competent data protection supervisory authority in the relevant Member State (e.g., the place where you reside, work, or of an alleged infringement of the GDPR).

6. Automated decision-making

The Company engages in certain limited automated decision-making, including profiling, for recruiting purposes, in order to efficiently narrow potential candidates to those who can legally be employed in the country in which the position is offered (e.g., work permit, permanent residency, or citizenship) and to those with the industry standard minimum qualifications for the respective position (e.g., professional licensure). If you are applying for a position in a country in which you are not eligible for employment, or for a position requiring an industry standard minimum qualification, for which you do not have, your application may be automatically denied. Additional information in this regard is set out above in Section 5.

7. What security measures does the Company implement?

The Company maintains appropriate technical and organizational security measures to protect against unauthorized or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data.

Any access to your Personal Data is restricted to those individuals that have a need to know in order to fulfill their job responsibilities, and the Company takes appropriate steps to ensure that such personnel are bound to duties of confidentiality with respect to Personal Data.

8. Questions?

If you have any questions about this Notice, you should contact andy.scott@darchem.com

Effective Date: May 25, 2018