
	LAR GROUP DATA PROTECTION	REVISION 0
	DPN-02-01-01-EN	2021
	PRIVACY NOTICE TRAINING	EFF: ALL

1. PRIVACY POLICY – TRAINING-APPLICANTS

- 1.1 **DATA PROCESSING.** LAR Group collects and processes personal data (**Personal Data**) in relation to Trainees (**you**) as part of its Pilot Trainings, First Aid, or Aircraft related Safety and Risk training processes. LAR Group is committed to respecting your privacy and protecting your Personal Data in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**). LAR Group processes your Personal Data as a controller in relation to this activity.
- 1.2 **DATA PROTECTION OFFICER.** LAR Group has appointed a data protection officer (**DPO**), who can be contacted at dpo@lar.lu
- 1.3 **PERSONAL DATA.** The following categories of Personal Data may be processed by us:
- a. Identification data and personal details: given name(s); gender; date of birth / age; nationality;
 - b. Contact details: address; telephone number; fax number; email address;
 - c. Employment details: name of current employer;
 - d. Finance details: bank account numbers.
- 1.4 **PURPOSES.** We process your Personal Data for the following purposes:
- a. Training Enrolment: for your enrolment and registration, either as a participant to the training under your employment contract and/or on the instructions of your employer or a third party, and/or on a voluntary basis.
 - b. Training Certification: to issue certificates and other documents attesting the completion of training and to ensure that training certificates can be used for further training (updating, refreshing skills, etc.);
 - c. Management of LAR Group’s trainings such as training planning and management, quality assessment, statistical analysis, monitoring our training staff and training of our own training staff.
 - d. Billing (you, your employer, or a concerned third party as appropriate).
 - e. For the establishment, exercise or defence of legal claims.
- 1.5 **LEGAL BASIS.** The processing of your Personal Data is based on the following grounds:
- a. For compliance with legal obligations to which we are subject (for example, in relation to management of training activities, accounting and other obligatory work processes);
 - b. For our legitimate interests: to run our training operations, to manage our training and related activities, to conduct quality assessment, statistics in relation to our training activities, training employee review activities, training of our training employees).
- 1.6 **DATA RECIPIENTS.** LAR Group may share your Personal Data internally and with certain third-parties or competent local authorities as necessary to achieve our above-mentioned purposes, and in accordance with applicable law. Third-Parties in this context could be for example: Business Partners or Agencies providing Trainings, booking service companies for accommodation, catering or

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training rooms, administrative or support service companies for example Anti-Fraud-Services, Governmental, judicial, tax, regulatory or similar agencies. Accountants, auditors, financial and tax advisors, lawyers, aviation safety and other outside professional advisors.

- 1.7 DATA TRANSFERS OUTSIDE THE EU/EEA. We do not transfer your Personal Data outside the EU/EEA for our internal recruitment process. However, if a specific situation requires to transfer Personal Data to a recipient outside of the EU/EEA, you should be aware that, in general, legal protection for personal data in countries outside the EU/EEA may not be equivalent to the level of protection in the EU/EEA. However we take steps to put in place suitable safeguards to protect your Personal Data, such as entering into EC approved standard contractual clauses. Further information on such safeguards can be obtained by contacting our DPO: dpo@lar.lu.
- 1.8 DATA RETENTION. We will retain your personal data for as long as required to manage our training activities, and to meet our legal obligations (generally for up to 10 years from the date of your last training).
- 1.9 YOUR STATUTORY RIGHTS. You have certain rights concerning your Personal Data as mentioned below, and can exercise them by contacting our DPO at :
 - a. **Access right.** You have the right to access your Personal Data. We process a large quantity of information, and can thus request, in accordance with the law, that before the information is delivered, you specify the information or processing activities to which your request relates.
 - b. **Right to rectification.** You can ask us to rectify, correct or update inaccurate and/or incorrect data;
 - c. **Other rights.** In certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled, in line with the law), you may object to, or request the limitation of, the processing of your Personal Data, or request the erasure or portability of your Personal Data. You should note that the law authorizes us to retain and continue processing certain Personal Data, even where you have exercised your rights to object or erasure, for legitimate and compelling reasons such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority: *Commission nationale pour la protection des données (CNPD)* to introduce a claim.
- 1.10 CHANGES TO THE POLICY. Changes may occur in the way we process Personal Data. This Privacy Policy will be updated to reflect these changes. The revision number and the date are recorded on this page. All changes become effective when a new update is posted unless indicated otherwise. Thus, we encourage you to check this page regularly.
- 1.11 TRANSLATION. These present legal notes are written in French, English and German but only the French version will be decisive in cases of litigation.