

Data Security and Privacy Policy

1. Controller

Barfield Inc., 4101 NW 29th Street, Miami, Florida 33142, U.S.A. (hereinafter ("Barfield", "we", "our", or "us"), hereby provide you with information on the processing of your personal data collected as part of your use of our website <https://www.barfieldinc.com> ("website"). All data collected through the Barfield website is processed in accordance with all local legislation and the General Data Protection Act (EU regulation 2016/679) or "GDPR". Barfield is a wholly-owned subsidiary of Air France KLM SA ("Air France KLM"), part of Air France Industries / KLM Engineering & Maintenance, and several pages of our website contain links to access the websites of Air France KLM and our affiliates. We recommend that you read the data privacy policies of these websites, as these terms vary from ours.

If you have further questions on the subject of data protection in connection with our website or the services offered on it, please contact our data protection officer:

Data protection officer of the Barfield, Inc.: Dino Noto
E-mail: dino.noto@barfeildinc.com

2. Scope and purpose of and legal basis for the processing of personal data

We collect and use personal data directly from our users or from other sources (see below) in the following situations:

2.1. Provision of the website and creation of log files

Whenever users visit our website, our system automatically records data and information from the computer system used to call our website. The following data ("technical information") is collected in the process:

- Information on the type of browser used and its version
- The user's operating system
- The user's Internet service provider
- The user's IP address
- The date and time of access
- Websites from which the user's system accesses our website
- Websites that the user's system calls from our website

We collect and use this technical information for purposes of (network) security (such as to combat cyberattacks), marketing, and to be able to better understand our users' needs, as well as to continuously improve our website and to enable us to deliver the website to the user's computer system.

The log files contain IP addresses or other data that may, in some cases, be able to be associated to a user. That may be the case, for example, if personal data is contained in the link to the website from which the user enters our website, or the link to the website to which the user switches.

The data is likewise stored in our system's log files. This data is not stored together with other personal data of the user.

The data is stored in log files in order to ensure that the website functions properly. This data also helps us optimize the website and ensure the security of our IT systems. It is not analyzed for marketing purposes in this connection.

The legal basis for the temporary storage of data and log files is Article 6(1)(f) of the EU General Data Protection Regulation (GDPR).

2.1.1. No use of cookies or geolocation

Our website does not use cookies or geolocation.

2.1.2. Tracking tool

We use the following tracking tool on our website:

- eTracker

The legal basis for using it is our legitimate interests in accordance with Article 6(1)(f) of the GDPR for the purpose of enhancing the efficiency of our website and (direct) marketing. Its functions are explained in the following paragraphs.

eTracker stores data on visitors, IP addresses and the device and domain data of visitors. This data is stored in truncated form or encrypted so that it is not possible to identify the individual user from it.

The collected data is administered in a highly secure, high-quality and highly available data center located in Paris France, which is certified as complying with ISO/IEC 27001:2013.

eTracker gives us insights into the following data:

- When the website was accessed (month, year, week, day, time of day)
- What devices were used to access the website and what browser and operating system those devices use
- What individual pages of the website are visited
- Visitors' regions and languages
- Visitors' click behavior: Click paths, click frequency
- Dwell times on the individual pages of the website

- Most-clicked pages on the website
- Where the website was accessed from (referrer)
- How often the website or its individual pages were called
- Whether and how visitors return to the website or its individual pages

You can obtain more information on this tracking tool at: <https://www.etracker.com/>

2.3. User administration in Customer Area Customer and Barfield Precision Electronics' Portal

If you want to use our Customer Area or Barfield Precision Electronics' portal in our website with respect to existing contracts with our customers, you must first be registered as a user by our customer service. To do this, we will need the following information from you: First name, last name, telephone number, e-mail address and customer organization.

2.4. User administration in our partner portal - Aero Web Tracker

If you want to use our partner portal in our website with respect to existing contracts with our suppliers and partners, you must first be registered as a user. To do this, we will need the following information from you: First name, last name, telephone number, e-mail address and partner organization. After you log in, several applications that are available via the portal can be called up directly (single sign-on). If an application is called up, the user ID and the organization of the user who has logged in are transferred to that application.

2.5. Authorization statistics

We provide selected users (called key users) with reports in order to enable regular audits of existing user IDs and the associated system authorizations by our customers. These reports include:

- User ID
- Name
- E-mail
- Telephone number
- Fax number
- Customer organization
- System authorizations

2.6. Statistical analyses

We analyze your data in a data warehouse so that our users' preferences can be evaluated ("statistical analyses"), to enable marketing oriented to users' interests, personalized user address and the continuous optimization of our business processes. We process the data in this way to gain a better understanding of what our customers expect from us and to be able to offer them personal communication tailored to their needs. These analyses also help us in fraud detection, auditing, and

ensuring security, i.e. we process the data to safeguard our legitimate interests in accordance with Article 6(1)(f) of the GDPR.

2.6. Our legitimate interests in processing personal data

Where Article 6(1)(f) of the GDPR is the legal basis for processing, our legitimate interests – apart from the purposes stated above – are:

- Protecting the company against material or non-material damage
- Making our products and services more professional
- Optimizing (controlling and minimizing) costs

2.7. Other processing obligations

Where we are obligated by law, we process personal data to comply with retention obligations under commercial law or to meet statutory requirements relating to security (such as those pursuant to). You can find more information on retention periods in the section "Duration of data processing" below.

3. Duration of data processing

Your personal data is erased as soon as it is no longer required for the specified purposes. It may be the case that personal data is retained for the period of time in which claims may be asserted against Barfield Inc. In addition, personal data is stored if and for as long as Barfield Inc. is obligated by law to do so. Such documentation and retention obligations are stipulated by the GDPR, among others.

4. Right to object in accordance with Article 21 of the GDPR

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data concerning you unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

Where personal data concerning you is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, the personal data concerning you will no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

5. Disclosure of personal data to third party

We may be required to forward your personal data to third parties within or outside the Barfield, Inc. in order to be able to offer you our products and services on the basis of our contractual obligations or our legitimate interests. These recipients can be categorized as follows:

- IT
- Marketing
- Service providers
- Transportation and logistics
- Government bodies and authorities
- Members of the Air France KLM Group

In the process, personal data may be transferred to third countries or international organizations. In order to protect you and your personal data, there are suitable safeguards in such cases as stipulated by and in compliance with statutory requirements (in particular the use of EU standard contractual clauses) or there is an adequacy decision adopted by the EU Commission (Article 45 of the GDPR).

You can find information on EU standard contractual clauses at [<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:DE:PDF>]. The EU Commission provides information on its adequacy decisions at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu].

We are also obligated by law to provide personal data to and international authorities (Article 6 (1) point (c) of the GDPR in conjunction with local and international regulations and agreements.

6. Rights of data subjects

Barfield Inc. is committed to the fair and transparent processing of data. We therefore believe it to be important that data subjects not only have the right to object, but can also exercise the following rights if the relevant legal requirements are fulfilled:

- Right to access personal data and obtain information (Article 15 of the GDPR)
- Right to rectification (Article 16 of the GDPR)
- Right to erasure ("right to be forgotten") (Article 17 of the GDPR)
- Right to restriction of processing (Article 18 of the GDPR)
- Right to data portability (Article 20 of the GDPR)

You can contact us by e-mail at odile.yakana@barfieldinc.com or sebastein.losy@barfieldinc.com to exercise your rights. To handle your request and for the purpose of identification, we note that we will process your personal data in accordance with Article 6(1)(c) of the GDPR.

7. Consent

If you have given us your consent to process your personal data, we note here that you can revoke this consent at any time.

You can contact us in all other cases or if you have problems revoking your consent on this website.

Please note that any revocation of your consent is valid only with future effect and does not have an impact on the lawfulness of past processing of your data. In some cases, we have the right despite the revocation of your consent to continue processing your personal data on another legal basis, such as to fulfill a contract.