

Audit Programs Privacy Policy

Edition 1



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1 Object and Scope of the Policy

The Audit Programs Privacy Policy (this “Policy”) is intended to inform the Data Subjects identified below regarding the collection, use, and potential disclosure of any personal data that they submit as part of their ongoing involvement with the following IATA audit programs (the “IATA Audit Programs”):

- IATA Operational Safety Audit (“IOSA”)
- IATA Standard Safety Assessment (“ISSA”)
- IATA Safety Audit for Ground Operations (“ISAGO”)

This Policy is specific to the following individuals (the “Data Subjects”) as it relates to the IATA Audit Program that they participate in:

- Auditors working as part of an Audit Organization (“AO”) in IOSA and ISSA;
- Auditors working as part of the Charter of Professional Auditors in ISAGO;
- Auditors working as part of the IOSA auditor cohort;
- AO staff managing the IOSA and ISSA programs;
- Ground Operations Agents (“GOA”) working to administer the ISAGO program;
- Auditees (Airline Operators or Ground Handling Service Providers) and ISAGO airline contact persons who manage their company’s involvement with an IATA Audit Program;
- Auditee employees interviewed during the course of an IATA Audit Program;
- Software provider employees who administer their company’s involvement with an IATA Audit Program;
and
- Consultants who administer their company’s involvement with an IATA Audit Program.

This Policy will be updated from time to time in accordance with any applicable privacy laws, including the European Data Protection Regulation (“GDPR”) and Canadian privacy laws.



2 Definition of Personal Data

When used in this Policy, personal data means any information relating to an identifiable natural person who can be identified, directly or indirectly, by reference to an identifier, such as, name, birth date, address, email address, website visitors' IP address, etc. ("Personal Data"). The principles of data protection should not apply to anonymous information, to the extent that the Data Subject is not, or no longer, identifiable.

This Policy also relates to processing Personal Data obtained via websites and/or databases used in an IATA Audit Program, whether the information is uploaded to the website (e.g., via a registration form), downloaded from it, or gathered when visiting a website (e.g., via cookies).



3 **Controllership of Personal Data**

In the context of the activities described in this Policy, IATA should be considered as “Data Controller” as defined by the GDPR: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.



4 Purposes for Personal Data Collection

IATA collects Personal Data for the purpose of audit/assessment management activities in IATA Audit Programs. In addition, IATA may use Personal Data to:

- Process service requests;
- Provide access to websites. It is strongly recommended to read the privacy policy of each of those websites; and
- Enable the review, development and improvement of products and services provided by IATA.

Finally, IATA may occasionally carry out industry research and send out surveys for the benefit of the IATA Audit Programs. Completion of such surveys is not mandatory, and Data Subjects can unsubscribe at any time.

Note — many IATA products and services require some Personal Data to operate and/or be provided to the Data Subject; hence, in some circumstances, if a Data Subject chooses not to provide the required Personal Data, they will not be able to use or access that service.



5 Processing Activities

The following tables outline the activities performed within the IATA Audit Programs where Personal Data is processed. Processing means any operation or set of operations that is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction (“Processing” or “Processed”).

IOSA

Description	Categories of Personal Data and Data Subjects	Purpose for Processing
<p>Account management of Data Subjects involved in the IOSA audit process and program management.</p> <p>Each Data Subject involved in an Audit Program has a user account containing their basic Personal Data for contact and program participation purposes, as well as to manage the program. Uses include to:</p> <ul style="list-style-type: none"> • Authenticate the identity of individuals contacting the Audit Program by telephone, electronic means, or otherwise; • Notify the target audience of changes to Audit Program services or policies; • Provide administrative messages, updates, notices or alerts; • Prepare and execute the agreement that the target audience is part of; • Manage Audit Program information technology applications and systems, including websites; and • Meet contractual, legal and regulatory obligations that the IATA Audit Programs is subject to. 	<p><u>Mandatory</u> Name, email, personal or work address, title, company address, work telephone, languages, gender, postal code, country</p> <p><u>Optional</u> Mobile phone, photo</p> <p><u>Data Subjects</u> As defined in Section 1</p>	<p>To achieve a standardized audit product and consistent conduct of audits, including robust and reliable IOSA audit program management that complies with requirements stated in the IOSA Program Manual covering:</p> <ul style="list-style-type: none"> • IOSA Program Management; • AO Accreditation; • Auditor Qualification; • Auditor Training; • Operator’s Responsibilities for IOSA Registration; • IOSA Registration; • Audit Conduct; • IOSA Audit Report (IAR) compilation and sharing; and • Dispute Resolution. <p>Quality Assurance oversight and performance monitoring as described in the Quality Assurance Program (QAP) manual.</p>

ISSA

Description	Categories of Personal Data and Data Subjects	Purpose for Processing
<p>Account management of Data Subjects involved in the ISSA assessment process and program management.</p> <p>Each Data Subject involved in an assessment program has a user account containing their basic Personal Data for contact and program participation purposes, as well as to manage the program. Uses include to:</p> <ul style="list-style-type: none"> • Authenticate the identity of individuals contacting the assessment program by telephone, electronic means, or otherwise; • Notify the target audience of changes to assessment program services or policies; • Provide administrative messages, updates, notices or alerts; • Execute the agreement that the target audience is part of; • Manage assessment program information technology applications and systems, including websites; and • Meet contractual, legal and regulatory obligations that the IATA assessment program is subject to. 	<p><u>Mandatory</u> Name, email, personal or work address, title, company address, work telephone, languages, gender, postal code, country</p> <p><u>Optional</u> Mobile phone, photo</p> <p><u>Data Subjects</u> As defined in Section 1</p>	<p>To achieve a standardized assessment product and consistent conduct of assessments, including robust and reliable ISSA assessment program management that complies with requirements defined in the ISSA Program Manual covering:</p> <ul style="list-style-type: none"> • ISSA Program Management; • AO Accreditation; • Auditor Qualification; • Auditor Training; • Airline Responsibilities for ISSA Registration; • ISSA Registration; • Assessment Conduct; • Assessment Report compilation and sharing; and • Dispute Resolution. <p>Quality Assurance oversight and performance monitoring as described in the QAP manual.</p>

ISAGO

Description	Categories of Personal Data and of Data Subjects	Purpose for Processing
<p>Account management of Data Subjects involved in the ISAGO audit process and program management.</p> <p>Each Data Subject involved in an Audit Program has a user account containing their basic Personal Data for contact and program participation purposes, as well as to manage the program. Uses include to:</p> <ul style="list-style-type: none"> • Authenticate the identity of individuals contacting the Audit Program by telephone, electronic means, or otherwise; • Notify the target audience of changes to Audit Program services or policies; • Provide administrative messages, updates, notices or alerts; • Execute the agreement that the target audience is part of; • Manage Audit Program information technology applications and systems, including websites; and • Meet contractual, legal and regulatory obligations that the IATA Audit Program is subject to. 	<p><u>Mandatory</u> Name, email, personal or work address, title, company address, work mobile phone, languages, gender, postal code, country</p> <p><u>Optional</u> Photo</p> <p><u>Data Subjects</u> As defined in Section 1</p>	<p>To achieve a standardized audit product and consistent conduct of audits, including robust and reliable ISAGO audit program management that complies with requirements defined in the ISAGO Program Manual covering:</p> <ul style="list-style-type: none"> • ISAGO Program Management; • ISAGO Registration and Station Accreditation; • Initial Audit Application; • Renewal Audits; • Audit Allocation and Scheduling; • ISAGO Agent; • Auditor Qualification (Charter of Professional Auditors); • Audit Conduct; • ISAGO Audit Report Management and Information Sharing; • ISAGO Program Oversight and Performance; • Dispute Resolution; • Scheme of Charges; and • Applicable Annexes.

GENERAL

Description	Categories of Personal Data and Data Subjects	Purpose for Processing
<p>Survey and Feedback</p>	<p>Organization representative's responses to a questionnaire</p> <p><u>Optional</u> name, title, email, organization address</p>	<p>By using surveys delivered to target audiences, an Audit Program aims to:</p> <ul style="list-style-type: none"> • Obtain inputs based on latest audit experience; • Estimate satisfaction levels with respect to audit services delivered by auditors/inspectors; • Identify any potential areas of improvement for the overall Audit Program and/or its processes; and • Improve the quality of service provided by the audit management organization, and auditors, to the auditees. <p>Surveys are created and managed on related platforms (e.g., SurveyMonkey, Google Forms, Microsoft Forms, Microsoft Word, PDF files).</p>
<p>Service Usage of Audit Program-related Website(s)</p> <p>IATA Audit Program Data Subjects may collect/send data via the web browser when visiting various Audit Program-related websites ("Log Data"), which may include:</p> <ul style="list-style-type: none"> • Data about the Data Subject's type of access; • Data about the Data Subject's interactions with a data platform, which includes the date and time of any requests made, logs, changes, etc. • Technical and Personal Data that may include URL information, cookie identifiers (see below), IP address*, types of devices being used to access or connect to IATA websites, unique device IDs. <p>*An IP address is considered Personal Data.</p>	<p>Name, email, title</p> <p>Data Subject's computer IP address</p> <p>URL information, cookie identifiers (see below), types of devices being used to access or connect to IATA websites, unique device IDs.</p>	<p>By providing a subscription option for public webpages, an Audit Program allows the public to sign up for automated notifications whenever new documentation is available.</p>

Description	Categories of Personal Data and Data Subjects	Purpose for Processing
<p>Website Cookies Cookies are files with small amounts of data, which may include an anonymous unique IP address identifier. Cookie information about the webpages visited and/or requested, and the IP address may also be recorded by IATA and/or third parties from the browser as set out in this Policy.</p>	<p>Data Subject's computer IP address</p> <p>Cookies data</p>	<p>Cookies are used for:</p> <ul style="list-style-type: none"> • Authentication - to identify the Data Subject when visiting and/or navigating a website; • Personalization - to store information about the Data Subject's preferences and to personalize the website; • Security - an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials; and • Analysis - to help analyze the use and performance of a website and services. <p>Browsers may be set to refuse all cookies, or to indicate when a cookie is being sent. If cookies are not accepted, some site functionalities may be lost.</p>
<p>Audit Software - Intalex</p>	<p>Name, email, title</p> <p><u>Data Subjects</u> As defined in Section 1</p>	<p>Intalex is an audit software used for performance of the IOSA/ISAGO/ISSA audits and assessments, and audit report production.</p>
<p>Absorb A training platform to develop and maintain audit-related computer-based training.</p>	<p>Name, email, title</p> <p><u>Data Subjects</u> As defined in Section 1</p>	<p>Personal Data is occasionally shared with vendors so the Data Subject can access their training platform, and for continuous improvement to the platform.</p>

6 Data Security as well as Technical and Organizational Measures

Extranet websites (e.g., TeamSite, SharePoint) used in IATA Audit Programs by Data Subjects are password restricted to authorized IATA personnel and authorized Data Subjects. Personal Data is also protected using technical and organizational measures related to access rights management, encryption, and training on the importance of preserving the privacy, confidentiality, and security of Personal Data collected for Audit Programs. These safeguards also apply when Personal Data is disposed of or destroyed.

Personal Data is physically stored in secure, protected IATA servers, accessible only by registered, authorized users in accordance with IATA's Information & Data ("I&D") policies. To protect Personal Data against accidental loss and to ensure business continuity in the event of a disaster, IATA I&D has implemented disaster recovery procedures and backs up of all server data on a regular basis in accordance with its relevant policies.

With regard to vendors InteleX, Survey Monkey and Absorb, the Personal Data contained in their platforms are maintained in accordance with their company privacy policy.



7 Vendors and Third-Party Recipients

IATA Audit Programs do not sell Personal Data to any organization or person; nor share any Personal Data with a third party without the Data Subjects' prior consent, other than as provided in this Policy, or as otherwise authorized by applicable laws and regulations.

7.1 Data Disclosure Without Prior Consent

Under certain circumstances, IATA may be required to disclose a Data Subject's Personal Data:

- To comply with a law, regulation, court order, subpoena, valid demand, search warrant, government investigation, or other legally valid request or inquiry;
- As requested by IATA accountants, auditors, agents, and/or lawyers; and/or
- Under any other legal basis for which consent is not required as set forth in any applicable laws and/or regulations.

The IATA Audit Program reserves the right to:

- Report to law enforcement agencies any activities that IATA, in good faith, believes to be unlawful
- Report to law enforcement and/or emergency services providers in an emergency or where required or permitted by laws and regulations; and
- Dispute such demands for Personal Data on a case-by-case basis, when it believes that the requests are too broad, vague, or lack proper authority.

IATA may release certain Personal Data, on a case-by-case basis, when it has reasonable grounds to believe that such release is reasonably necessary to protect the rights, property, and safety of others and itself in accordance with, or as authorized by, law.

7.2 Third-Party Website Control

Note that IATA's websites may contain links to third-party websites that IATA does not control. Therefore, IATA is not responsible nor liable for any processing of Personal Data provided by Data Subjects to those third-party websites. It is important that Data Subjects satisfy themselves that the privacy policy of these third-party websites is appropriate for them. It is recommended to review the privacy policy of any third-party website that is used. IATA does not take any responsibility nor liability for third-party websites, either in terms of their content or the information they gather from Data Subjects.



8 Retention

IATA will securely store Personal Data for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law. Once no longer required, the Personal Data will be securely destroyed or anonymized (so the data no longer identifies the Data Subject).



9 Data Subject Rights

Data Subjects have the right to access and rectify the Personal Data held by IATA, subject to any legal restrictions. Upon request, IATA will provide the Data Subject with access to their Personal Data as set forth in applicable laws and regulations. It is always the Data Subject's responsibility to provide accurate, correct and complete Personal Data.

Some Personal Data held by IATA is accessible to Data Subjects through their online account(s). They can access, update or correct their Personal Data any time by logging into their account(s) and updating their profile information and/or preferences.

To the extent permissible by applicable data privacy laws and regulations, a Data Subject might be granted additional rights, such as the right to object to the processing of Personal Data or the right to withdraw consent.

Data Subjects may contact IATA through the contact emails below for further information about their rights or to request access to or rectification of Personal Data.



10 Contact Information

For questions regarding the IATA Audit Program privacy practices described in this Policy, the processing of Personal Data, and/or to exercise Data Subject rights, please contact the appropriate IATA Audit Program as follows:

IATA Operational Safety Audit (IOSA) iosa@iata.org

IATA Standard Safety Assessment (ISSA) issa@iata.org

IATA Safety Audit for Ground Operations (ISAGO) isago@iata.org

No reader should act on the basis of any information contained in this Policy without first referring to applicable laws and regulations and/or taking appropriate professional advice.



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