

The previous version of the Pilot Runway Program Privacy Notice: http://pilotrunway.com/storage/privacy_noticev2.pdf.

PRIVACY NOTICE
PILOT RUNWAY PROGRAM

1. PILOT RUNWAY PROGRAM INTRODUCTION

This privacy notice (“Privacy Notice”) is intended for the candidates, i.e., future pilots, who wish to participate in a “Pilot Runway Program” (“Program”) as well as the guarantors and their spouses (if any) whose personal data may be collected and processed in connection with the implementation of the Program.

BAA may change or update this Privacy Notice on a regular basis. If changes to how your personal data is processed will have a significant effect on you personally, we will take reasonable steps to notify you.

Program Outlines

▪ *All-in-One Training Program*

The Program is an all-encompassing competency based Multi-Crew Pilot License (MPL) program, covering Ab Initio flight school training, Type Rating, Base training provided by us, an approved training organization, UAB “BAA Training” (BAA), as well as Line training provided by respective airline company participating in the Program.

▪ *Job Guarantee*

The uniqueness of the Program lies in the job guarantee and financing model. The Program ensures that successful candidates start their training with secured First Officer position in the respective airline company (-ies) participating in the Program.

▪ *Financing opportunity*

The Program offers an exclusive financing model within the aviation industry since the candidates can apply for the funding of the aviation trainings from the airline company (-ies) participating in the Program. In case the aviation trainings are financed by the airline company participating in the Program, the candidate will have to provide a guarantee to secure the loan.

Program Period

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The Program covers the period from the moment the candidate completes and submits an inquiry form until:

- (i) In case flight crew aviation trainings are financed by the airline company - when the candidate fully covers the loan;
- (ii) In case flight crew aviation trainings is paid without airline company financing - before the employment contract is concluded with the airline company.

Companies participating in the Program:

Approved training organization:

UAB "BAA Training" (Lithuania)

Airlines company(-ies):

Avion Express Malta Ltd. (Malta)

2. DATA CONTROLLERS, THEIR ROLES & CONTACT DETAILS

Unless otherwise indicated in this Privacy Notice, BAA and other companies participating in the Program are considered independent data controllers in relation to the data subjects (candidates, guarantors, their spouses, other) whose data are collected and processed during the implementation of the Program with each company being able to determine the purpose and means of processing the personal data held under its control. BAA and airline companies participating in the Program are considered independent data controllers in both cases, (i) when they collect data directly from data subjects (ii) as well as when they obtain personal data not from the data subjects (including cases when personal data is received from another company participating in the Program).

With respect to the separate control of the companies participating in the Program and without the intention to enter into a joint control as defined in Article 26 of the GDPR, this Privacy Notice may contain basic information on the processing of the personal data organized by other independent data controllers (e.g., airline companies participating in the Program) since: (i) BAA and other companies participating in the Program are seeking maximum transparency; (ii) in most cases BAA will have the initial contact with the data subjects involved in the Program.

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CAUTION: Despite that information referring to the other data controllers processing was coordinated with the respective data controller (airline company), it should be treated as indicative only. To obtain accurate information about data processing organized by another data controller, the respective data controller should be contacted directly.

Contact details of the data controllers participating in the Program:

Company details:	UAB "BAA Training", company code 300618099, registered office address Dariaus ir Gireno st. 21, LT-02188 Vilnius, Lithuania, company's e-mail address info@baatraining.com , phone No. +370 5 252 5536.
Role in the Program	Approved training organization providing aviation trainings.
Data processing status	<ul style="list-style-type: none"> - Controller. - To the extent determined in the "Agreement on the Processing of Jointly Processed Personal Data of the Group of Companies Avia Solutions Group" (hereinafter – "Joint Controller Agreement") BAA processes certain personal data as joint controller with other Avia Solutions Group companies¹. An extract containing material provisions of the Joint Controller Agreement might be provided to you by contacting Data Protection Officer.
Data Protection Officer contact details:	privacy@baatraining.com

In case you wish to contact an airline company (-ies):

Company details:	Avion Express Malta Ltd., registration number in Malta C 87300, registered office address NuBis Centre, Mosta Road, Lija LJA 9012, Malta, email address info@avionexpress.aero .
Role in the Program	Airline company.

¹ The contact details of each Avia Solutions Group company can be found here: <https://aviasg.com/en/the-group/general-contacts>

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Data processing status	<ul style="list-style-type: none"> - Joint controller with affiliate company UAB “Avion Express”, company code 300087830, address: Dariaus ir Gireno st. 21A, LT-02189 Vilnius, Lithuania. - Joint controller* with parent company: AVIA SOLUTIONS GROUP (ASG) PLC, company number: 727348, registered office: 20 Kildare Street, Dublin 2, Dublin, Ireland, correspondence address: Dariaus and Gireno st.21a, LT-02189 Vilnius, Lithuania. <p><i>* The purposes, scope and other details of jointly processed personal data are determined in the “Agreement on the Processing of Jointly Processed Personal Data of The Group of Companies Avia Solutions”. The essence of aforementioned agreement is provided to the data subjects by contacting Data Protection Officer.</i></p>
Data Protection Officer contact details:	dataprotection@avionexpress.aero

We assure processing of your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“Regulation”).

We will process your personal data legally, honestly and transparently, in compliance with the requirements set by legislation, as well as ensuring data security, implementing appropriate technical and organizational measures to protect your personal data from illegal destruction and/or accidental change, disclosure and from any other unlawful processing.

Given the fact that the final decision on the inclusion of the candidate in the Program is made after several stages and there are many mandatory legal requirements for the recruitment of the candidate, BAA and the airline companies participating in the Program will, while respecting the candidates privacy and the data processing principles set out in the applicable laws, endeavour to ensure that at each stage only the amount of personal data that is necessary and proportionate to achieve a specific legitimate purpose is collected.

Hereinafter BAA is providing detailed information about the processing of your personal data by each stage of the implementation of the Program.

Please check this column “Data Controller(s)”
to identify the initial data controller:

3. PARTICULARITIES OF PERSONAL DATA PROCESSING AT EACH STAGE

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3.1. APPLYING FOR THE PARTICIPATION IN THE PROGRAM

The candidate, who is interested in participating in the Program, fills out the inquiry form published on BAA webpage: <https://pilotrunway.com/>.

The candidate submitting the inquiry form is requested to familiarize with this Privacy Notice. Upon receiving the inquiry accompanied with the consent to the data processing, BAA will assign the candidate a personal manager. The personal manager will contact the candidate to give a better idea of what the Program entails, including but not limited to, Program stages, pre-entry criteria, required documents and information, etc.

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
UAB "BAA Training"	Candidate (applicant)	To contact the candidate (applicant) regarding participation in the Program.	Consent of the data subject (Article 6.1(a) of the Regulation)	Name; Surname; Email address; Phone number.	2 years or until the consent is revoked (whichever occurs sooner).	
UAB "BAA Training"	Candidate (applicant)	To evaluate the applicant's eligibility to be enrolled to the Program.	Consent of the data subject (Article 6.1(a) of the Regulation)	Citizenship*; Age; Information on English proficiency level (options: A/B/C levels; native speaker; not sure); Information about the education level (options: upper secondary; post-secondary; bachelor's; master's; doctoral).	2 years or until the consent is revoked (whichever occurs sooner).	*We ask to provide citizenship information because currently due to the Program model we can implement the Program with candidates from limited number European countries. Other information is requested considering statutory and company's rules and regulations.
UAB "BAA Training"	Candidate (applicant)	For the direct marketing purposes.	Consent of the data subject (Article 6.1(a)	Name; Email Address; Phone number.	2 years or until the consent is revoked (whichever occurs sooner).	For more information: https://baatraining.com/privacy-policy/

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3.2. IMPLEMENTATION OF THE ONBOARDING PROCEDURE AND DUE DILIGENCE PROCEDURE

BAA is part of Avia Solutions Group, the largest aerospace business holding in Central & Eastern Europe, offering aviation services worldwide. We take a zero-tolerance approach to money laundering and terrorism financing and are committed to the highest level of openness, integrity, and accountability. Seeking legitimacy and being reliable, we conduct business only with reputable counterparties whose funds are derived from legitimate sources and who have no imposed sanctions on them.

To ensure the aforementioned, BAA has implemented Onboarding and Due Diligence Procedure that imposes the requirement to screen every counterparty before entering into any business relationship. Following the Onboarding and Due Diligence Procedure, the candidate, wishing to participate in the Program, will be asked to fill in Know Your Customer Form (KYC Form), Client’s Declaration Form, Questionnaire for Politically Exposed Persons (if applicable) and to provide accompanying documents certifying identity, residential address, other details indicated in the KYC Form or arising from it such as, e.g., source of funds (as the case may be).

The candidate is informed that the guarantor (if any) and any other third-party transferring funds to BAA on behalf of the cadet, will also be requested to fill in the forms and submit accompanying documents. The documents should be submitted no later than:

<i>On behalf of the candidate</i>	No later than before entering into Assessment Agreement (see Section 3.3.). In case BAA applies an exception (as detailed below in this Section) – no later than before arranging the assessment part conducted by airline company (i.e., final interview).
<i>On behalf of the guarantor</i>	No later than before arranging the assessment part conducted by airline company (i.e., final interview).

In case the candidate submits the requested documents on behalf of the guarantor or any other third-party, the candidate must ensure that these persons are familiarized with Privacy Notice, Privacy Notice dedicated to the Onboarding and Due Diligence Procedure and do not object to the personal data processing as detailed in the above documents.

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All information concerning personal data processing in relation to Onboarding and Due Diligence Procedure is published on BAA's website: <https://baatraining.com/privacy-notice/>. The basic information is also provided below in the table:

Data controller(s)	Data subject	Purpose of processing	Legal basis for processing	Personal data	Retention Period	Remarks
UAB "BAA Training"	Candidate; Guarantor.	To fulfil our legal obligation to monitor and implement the international and/or national sanctions.	Article 6.1(c) of the Regulation.	Personal data contained in the forms: KYC Form; Clients Declaration Form;	5 years.	For more detailed information, please read Onboarding and Due Diligence Procedure Privacy Notice: https://pilotrunway.com/storage/Privacy-notice_Onboarding_version-2.0.pdf
		To ensure our legitimate interest to fulfil the requirements for money laundering and financing terrorism prevention, prevention of corruption, bribery, and fraud to be legitimate, reliable, and reputable business to our counterparties and authorities.	Article 6.1.(f) of the Regulation.	Questionnaire for Politically Exposed Persons (if applicable). Personal data contained in the copies of the documents: identity document; document proving residential address; documents proving sources of funds (in certain cases), other documents verifying information contained in the KYC Form (as the case might be). Data obtained via consolidated list of sanctions; Data obtained via other commercially		

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				available public sources (e.g., DowJones).		
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Upon unilateral decision of BAA, a simplified Onboarding and Due Diligence Procedure for the candidate (exclusively) may be applied before entering into Assessment Agreement during which only a copy of the identity document is requested. Nevertheless, a full screening in accordance with Onboarding and Due Diligence Procedure must be carried out no later than before the assessment part conducted by airline company (i.e., job interview). Details of personal data processing while performing simplified Onboarding and Due Diligence Procedure:

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
UAB "BAA Training"	Candidate	To fulfil our legal obligation to monitor and implement the international and/or national sanctions.	Article 6.1(c) of the Regulation.	Personal data contained in the copies of the documents: identity document; Data obtained via consolidated list of sanctions. Data obtained via other commercially available public sources (e.g., DowJones);	5 years.	For more detailed information, please read Onboarding and Due Diligence Procedure Privacy Notice: https://pilotrunway.com/storage/Privacy-notice_Onboarding_version-2.0.pdf
		To ensure our legitimate interest to fulfil the requirements for money laundering and financing terrorism prevention, prevention of corruption, bribery, and fraud to be legitimate, reliable, and reputable business to our counterparties and authorities.	Article 6.1.(f) of the Regulation.			

3.3. CONCLUSION OF THE ASSESSMENT AGREEMENT

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Before entering into Training Service Agreement, the candidate will have to pass an assessment as detailed in the Assessment Agreement that will be entered by and between the candidate and BAA. The assessment of the candidate consists of two stages:

- assessment conducted by BAA; and
- final interview with the airline company(-ies) participating in the Program.

Candidate is invited to participate in the final interview with the airline company(-ies) only subject to:

- satisfactory results (successful pass) of BAA assessment as detailed in the Assessment Agreement; and
- successful onboarding in accordance with Onboarding and Due Diligence Procedure; and
- in case the candidate seeks to receive funding from airline company(-ies): positive creditworthiness assessment results as detailed below in this Privacy Notice.

3.3.1. BAA ASSESSMENT:

BAA, acting as an approved training organization, before entering into Training Service Agreement must ensure compliance with pre-entry requirements arising from European Union law and local legislations requirements. Therefore, performs assessment that includes: (i) assessment of knowledge and skills relevant to pilot's job; (ii) assessment of certain personal/behavioural traits and competencies relevant to pilot's job; (iii) interview for verification of test results; (iv) other related actions required to evaluate preparation of the candidate for pilot's job. BAA assessment procedure is described in UAB "BAA Training" Assessment Manual (ATO AM) approved by the Civil Aviation Authority of the Republic of Lithuania. The summary of data processing during the BAA assessment part is provided below:

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
UAB "BAA Training"	Candidate	To ensure that the candidate respects pre-entry requirements for conclusion of the Assessment Agreement such us: <ul style="list-style-type: none"> - minimum age, - educational requirements. 	Article 6.1.(b) of the Regulation.	Name; Surname; Date of birth. Copies of the documents: Identity Document, Higher Education Diploma.	Unsuccessful candidates: 12 months after BAA assessment date; Successful candidates: 5 years after competition of the trainings.	CAUTION: At this stage the candidate is not asked to provide a document certifying his health condition, however the candidate is informed that it is a mandatory requirement to obtain Valid EASA 1st Class Medical Certificate before trainings.

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UAB "BAA Training"	Candidate	To perform the Assessment Agreement, i.e., perform assessment of the candidates' skills, i.e., assess knowledge, skills, certain personal/behavioural traits and competencies relevant to pilot's job.	Article 6.1(b) of the Regulation.	Copies of the documents: Higher Education Diploma; CV in English; Recommendations of former employers (if any); Information about candidates' licenses, candidates' qualifications, candidates' experience in aviation; Assessment test results.	Unsuccessful candidates: 12 months after BAA assessment date; Successful candidates: 5 years after competition of the trainings.	concluding Training Service Agreement. CAUTION: in case the candidate is invited to the final interview with the airline company(-ies), personal data collected and/or created by BAA in relation to performance of the BAA part assessment will be shared with airline company(-ies) mentioned in the Assessment Agreement.
UAB "BAA Training"	Candidate	To conclude and perform the Assessment Agreement.	Article 6.1(b) of the Regulation.	Name; Surname; Personal identification number; Address; E-mail address; Phone number; Bank account number; Signature.	For the duration of the Assessment Agreement and 10 years after expiration/termination of the Assessment Agreement.	

3.3.2. AIRLINE COMPANY ASSESSMENT

Final Interview shall be performed at the facilities of BAA or the airline company(-ies) participating in the Program. Before arriving, the candidate must ensure that he is able to obtain EASA 1st Class Medical Certificate and, upon request, to be able to show it.

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<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
Airline company (indicated in the Assessment Agreement)	Candidate	To check if the candidate respects pre-entry medical requirements for conclusion of the Training Service Agreement and further recruitment by the airline company.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6.1(b) of the Regulation)	Information on whether the candidate has obtained EASA 1st Class Medical Certificate (options: Yes; No).	Unsuccessful candidates: 12 months after airline company assessment date. Successful candidates: during the entire period of validity of the contractual obligations arising from the Program.	CAUTION: The copy of the document is not collected at this stage.
Airline company (indicated in the Assessment Agreement)	Candidate	To check if the candidate respects pre-entry requirements for conclusion of the Training Service Agreement and further recruitment by the airline company.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of	Notes taken during the Final interview including information on professional qualities and personal characteristics.	Unsuccessful candidates: 12 months after airline company assessment date. Successful candidates: during the entire period of validity of the contractual obligations arising from the Program.	

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			the data subject prior to entering into a contract Consent of the data subject (Article 6.1(b) of the Regulation)			
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3.4. ASSESSMENT OF THE CREDITWORTHINESS OF THE CANDIDATE, GUARANTOR (IF ANY) AND THEIR SPOUSES (IF ANY)

The Program provides for the opportunity for the candidate to receive funding for the trainings from the aviation company participating in the Program. The funding is granted in the format of the loan which should be secured by the guarantor. In case the candidate is willing to receive funding, the candidate must provide Credit Rating Report to verify candidates’, the guarantors’ and their spouses’ (if any) creditworthiness. The candidate is asked to provide BAA with Credit Rating Reports subject to satisfactory results of BAA assessment before arranging final interview with the airline company. The spouses (if any) of the candidate and the guarantor will also be requested to provide consents to the conclusion of Loan/Guarantee Agreements.

Creditworthiness evaluation will be performed by BAA.

The Loan Agreement will be signed on behalf of the candidate and the respective airline company.

Guarantee Agreement shall be entered between the guarantor and the respective airline company.

Both agreements must be approved by a notary public in the Republic of Lithuania or other countries.

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
UAB "BAA Training"	Candidate; Guarantor;	To assess the creditworthiness in order to evaluate his/her ability to duly perform financial	Consent of the data subject (Article 6.1(a))	Name; Surname; Personal identification number; Date of birth; Signature; Personal	Unsuccessful candidate: 12 months or	CAUTION: in case the candidate is invited to the final interview with the airline company(-ies), personal data collected and/or

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	Spouses of the candidate and/or guarantor (if any)	obligations in relation to financing of aviation trainings.	of the Regulation)	data contained in Credit Rating Report; Creditworthiness assessment results.	until the consent is revoked (whichever occurs sooner). Successful candidate: during the entire period of validity of the contractual obligations arising from the Program or until the consent is revoked (whichever occurs sooner).	created by BAA in relation to performance of the creditworthiness will be shared with airline company(-ies) mentioned in the Assessment Agreement.
UAB "BAA Training"	Candidate; Guarantor; Spouses of the candidate and/or guarantor (if any)	To ensure that the candidate and/or guarantor will not be restricted from entering into Loan Agreement, Guarantor Agreement in relation to their marital status.	Consent of the data subject (Article 6.1(a) of the Regulation)	Personal data contained in the consent issued on behalf of the candidates' and/or guarantors' spouse (if any) to enter into Loan Agreement and/or Guarantee Agreement such as: Name; Surname; Date of birth; Personal identification number; Marital status; Signature.	Unsuccessful candidate: 12 months or until the consent is revoked (whichever occurs sooner). Successful candidate: during the entire period of validity of the contractual obligations arising from the Program or until the consent is revoked (whichever occurs sooner).	.

3.5. SIGNING OF THE AGREEMENT ON FUTURE EMPLOYMENT CONDITIONS

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In case the candidate passes airline company assessment part and subject to implementation of all aforementioned steps, the candidate and the respective airline company concludes Agreement on Future Employment Conditions (AFEC) which will stipulate intention of the airline company to conclude an employment contract under indicated terms and conditions with the candidate after successful obtaining of MPL as well as subsequent passing the psychological review performed by airline company and other obligatory pilot onboarding procedures and agreement of the cadet to be employed by the airline company pursuant to such pre-agreed terms and conditions.

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
Airline company being party to the Agreement of Future employment conditions (AFEC).	Candidate	Processing is necessary for the performance of the Agreement of Future Employment Conditions (AFEC), to agree and clarify main conditions of future employment.	Article 6.1(b) of the Regulation.	Name; Surname; Personal identification number; Address; Nationality; Email address; Signature.	In case the candidate is employed: 10 years after the expiration of the Employment Agreement. Unemployed candidate: during the entire period of validity of the contractual obligations and 10 years after the expiration of the contractual obligations	.

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3.6. ENTERING INTO TRAINING SERVICE AGREEMENT

After successfully completing the steps detailed above, the parties of the Program prepare to sign a tripartite training contract between BAA, the airline company and the candidate - the future pilot. The candidate submits all the documents and information (if not yet provided) necessary for concluding the Training Service Agreement, including but not limited to Valid EASA 1st Class Medical Certificate.

This is a very exciting and responsible moment at the same time since the candidate is taking a big step to fulfill his dream, but at the same time he must be critical and assess whether he really meets all the requirements for the pilot profession.

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
UAB "BAA Training"	Candidate	To implement statutory requirement to ensure that the candidate respects pre-entry requirements to be provided with aviation trainings: <ul style="list-style-type: none"> - minimum age; - medical requirements; - educational requirements (including language). 	Article 6.1.(c) of the Regulation. / Article 9.2.(g) of the Regulation.	Identity document; Valid EASA 1st Class Medical Certificate; Higher Education Diploma; Information about your licenses, your qualifications, your experience in aviation; BAA assessment results.	5 years after completion of the trainings.	The obligation arises from various EU Regulations applicable to ATO, including but not limited to: Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council Text with EEA relevance A consolidated version of the requirements is available in Easy Access Rules for Organization Requirements for Aircrew (Part-ORA) published by EASA:

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						<p>AMC1 ORA.ATO.230(a)</p> <p>https://www.easa.europa.eu/sites/default/files/dfu/Easy_Access_Rules_for_Organisation_Requirements_for%20Aircrew-Part-ORA-Jun20.pdf</p>
UAB "BAA Training"	Candidate	To perform aviation training services under the aviation training service agreement and to track training results	Article 6.1.(b) of the Regulation	Name, Surname; Learning results such us: results of school (BAA) and TKA exams, attendance, personal data contained in logbooks, behavioural and learning progress characteristics, competence assessment, feedback from instructors and other BAA staff.	5 years after completion of the trainings.	
UAB "BAA Training"	Candidate	To ensure that the candidate is allowed to access the restricted area used by BAA to provide practical flight trainings.	Consent of the data subject (Article 6.1(a) of the Regulation)	Copy of non-criminal record certificate.	For the duration of the Training Service Agreement and 6 months after expiration/termination of the Training Service Agreement.	The non-criminal certificate is requested only if the area where the practical flights are carried out is restricted (e.g., airports, airfields) and such requirement is established by laws.

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UAB "BAA Training"	Candidate	To execute and perform other obligations deriving from Training Service Agreement	Article 6.1.(b) of the Regulation	Name; Surname; Personal identification number; Address, Telephone number; Email address; Bank account details; Signature;	For the duration of the Training Service Agreement and 10 years after expiration/termination of the Training Service Agreement.	
Airline company being party to Training Service Agreement						

3.7. CONCLUSION OF THE LOAN AGREEMENT AND THE GUARANTEE AGREEMENT

Just after the conclusion of the Training Service Agreement the persons involved in the Program are entering into the Loan Agreement and the Guarantor Agreement.

Please be aware of that notaries may request additional information and/or other documents to formalize the agreements. If requested by notaries, any additional information/documentation should be submitted directly to them.

<i>Data controller(s)</i>	<i>Data subject</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>	<i>Personal data</i>	<i>Retention Period</i>	<i>Remarks</i>
Airline company being party to Loan Agreement. Airline company being party to guarantee Agreement.	Candidate; Guarantor; Spouses of the candidate and/or guarantor (if any).	Conclude and perform the Loan and/or Guarantor Agreement to ensure financial support for candidate.	Article 6.1(b) of the Regulation. processing is necessary for the performance of a contract to which the data subject is party.	Name; Surname; Personal identification number; Bank account number; Address; Nationality; Email address; Signature.	During the validity term of the Loan Agreement and 10 years after the expiration of the Loan Agreement	

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<p>Airline company being party to Loan Agreement. Airline company being party to guarantee Agreement.</p>	<p>Candidate; Guarantor; Spouses of the candidate and/or guarantor (if any).</p>	<p>To assess creditworthiness and manage the debt.</p>	<p>Article 6.1(b) of the Regulation. processing is necessary for the performance of a contract to which the data subject is party.</p>	<p>Name; Surname; Personal identification number; Date of birth; Signature; Personal data contained in Credit Rating Report; Creditworthiness assessment results</p>	<p>During the validity term of the Loan Agreement and 10 years after the expiration of the Loan Agreement.</p>	
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3.8. FORMALIZATION OF OTHER SIDE CONTRACTS AND IMPLEMENTATION OF OTHER FORMALITIES

In order to implement side obligations (e.g., a life insurance and loss of license insurance (due to injury or illness) determined in the aforementioned agreements. In such cases, the candidate will be asked to provide additional documents and data to the relevant service provider – independent data controller.

3.9. FINAL AIRLINE COMPANY ASSESSMENT & BACKGROUND CHECK OF THE CANDIDATES

Final airline company assessment and background check are performed after the successful completion of a training course before signing an employment contract.

Final airline company assessment is performed in alignment with the criteria outlined by EASA CAT.GEN.MPA.175(b). During the assessment the following areas will be evaluated: i) cognitive abilities, ii) personality traits, iii) operational and professional competencies, and iv) social competencies.

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Data controller(s)	Data subject	Purpose of processing	Legal basis for processing	Personal data	Retention Period	Remarks
Airline	Candidate	Airlines must conduct psychological assessments for pilot candidates based on the criteria outlined by EASA CAT.GEN.MPA.175(b) or the equivalent regulation in force at the time of pre-employment.	Article 6.1(b) of the Regulation.	Name; Surname; E-mail; Assessment results that include: i) Cognitive Abilities, ii) Personality Traits, iii) Operational and Professional Competencies, and iv) Social Competencies.	During the term of the Employment Agreement and 5 years after the expiration of the Employment Agreement.	

To align with the Commission Regulation [\(EU\) 2015/1998](#) Chapter 11, before concluding an employment contract, the airline company must also perform background checks of the candidate. These checks may include establishing the person's identity based on documentary evidence, covering criminal records in all states of residence during at least the preceding 5 years, covering employment, education, and any gaps during at least the preceding 5 years, and covering intelligence and any other relevant information available to the competent national authorities that airlines consider may be relevant to the suitability of a person to work in a function which requires an enhanced background check.

Data controller(s)	Data subject	Purpose of processing	Legal basis for processing	Personal data	Retention Period	Remarks
Airline	Candidate	To align with the legal obligations set out in Commission Implementing Regulation (EU) 2015/1998 of 5 November 2015 (or equivalent regulation in force) laying down detailed measures for the implementation of the common basic standards on aviation security.	Article 6.1(b) of the Regulation.	Name, Surname, Gender, Date of birth; Identity number; Identity document type, Identity document number, Phone number, Email address, Citizenship, Address; Father's name and surname, Mother's name; Mother's Maiden Name, Residence place of the last 5 years, Residence permits in non-EU countries; education information, Aviation security-related training courses in the last 3 years	During the term of the Employment Agreement and 5 years after the expiration of the Employment Agreement.	Airline company will carry out a check of criminal charges and convictions through all available law enforcement systems, including any local police records, and will also check the accuracy and reliability of the information (personal and professional) provided in the Candidate Personal Data Form. From previous employers, educational institutions, public authorities and other persons

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				information, Places of employment (or education) for the last 5 years, Periods of more than 28 calendar days (breaks) in the last 5 years during which the candidate did not work or study anywhere (if any), References contacts.		specified by the candidate in order to comply with the legal requirements established by Commission Regulation (EU) 2015/1998.
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Also, the airline company is collecting candidate confirmation information as follows: I have not been convicted of any crime and have no outstanding or expunged criminal records. I have no convictions for serious crimes, terrorist acts, or related offenses. I have no outstanding sentences or convictions (unless exempted from serving). In the last 2 years, I have not received two or more administrative penalties for aviation security violations. I have no hostile interests against EU member countries and have not cooperated with any foreign military, intelligence, or security services. I have not been involved with any terrorist organizations or groups. In the last 5 years, I have not participated in activities of any unregistered movements that would question my suitability for this function

In case during the implementation of the Program, the legislative bodies impose mandatory requirement for BAA and/or any airline company participating in the Program to collect additional information including personal data, the candidate and/or other data subjects related to the Program may be requested to provide personal data and other information not included in this Privacy Notice.

CAUTION: THE BACKGROUND CHECK ACCORDING TO COMMISSION REGULATION (EU) 2015/1998 IS AN ESSENTIAL CONDITION FOR THE CONCLUSION OF AN EMPLOYMENT CONTRACT. IF THE CANDIDATE FAILS THE BACKGROUND CHECK, THE EMPLOYMENT CONTRACT WILL NOT BE CONCLUDED

4. DATA PROCESSING FOR OTHER PURPOSES

All the above-listed personal data may, on the basis of Article 6.1.(f) of the Regulation, be processed by BAA and/or airline company(-ies) participating in the Program in order to manage disputes and administer debts. The retention period depends on the statute of limitations in each jurisdiction.

5. INFORMATION ON WHERE DO WE GET YOUR PERSONAL DATA FROM

The previous version of the Pilot Runway Program Privacy Notice: http://pilotrunway.com/storage/privacy_noticev2.pdf.

BAA will receive your personal data directly from you. BAA may also obtain information from:

- Airlines companies' participating in the Program;
- In certain cases, a credit rating report may be obtained directly from the credit bureau (e.g., Creditinfo Lietuva, UAB);
- Consolidated lists of sanctions managed by institutional authorities;
- Other commercially available/public sources on the internet (e. g. <https://www.dowjones.com/professional/risk/>).

In case you are the guarantor, the spouse of the candidate and/or the guarantor:

- We may also obtain your data from the candidate who filled in the inquiry to be included to the Program.

Airline company(-ies) will receive your personal data directly from you. Airline may also obtain information from:

- BAA.
- Law enforcement agencies, local police, previous employers, educational institutions, public authorities and other persons specified by the candidate in order to comply with the legal requirements set out in Commission Regulation (EU) 2015/1998. For further information, please refer to paragraph 3.9 of this Privacy Notice.

In case you are the guarantor, the spouse of the candidate and/or the guarantor:

- Airline company may obtain your data from BAA or the candidate who filled in the inquiry to be included to the Program.

6. IS IT MANDATORY TO PROVIDE YOUR PERSONAL DATA

Submission of personal data is not mandatory, but if you do not submit the data, you will not be able to participate in the Program. Therefore, non-provision of the personal data may lead to refusal to include you to the Program as well as the termination of any concluded agreements in relation to the Program (if any) with the subsequent consequences.

7. INFORMATION ON TO WHOM WE MAY PROVIDE YOUR PERSONAL DATA

The previous version of the Pilot Runway Program Privacy Notice: http://pilotrunway.com/storage/privacy_noticev2.pdf.

- Avion Express Malta Ltd., company code C87300, registered office address NuBis Centre, Mosta Road, Lija LJA 9012, Malta (i.e., airline company participating in the Program). Avion Express Malta Ltd is a joint controller with affiliate company UAB “Avion Express”, company code 300087830, address: Dariaus ir Gireno st. 21A, LT-02189 Vilnius, Lithuania;
- Other airline companies participating in the Program the list of which is included to this Privacy Notice;
- AVIA SOLUTIONS GROUP (ASG) PUBLIC LIMITED COMPANY, company code 727348, registered office address Building 9, Vantage West, Central Park, Dublin, D18 FT0C, Ireland (i.e., parent company of UAB “BAA Training”) and its assignee and its’ affiliate companies;
- Public authorities, including the civil aviation authorities, at the request of these authorities or in cases established by law, or upon your request;
- Law enforcement agencies, local police, previous employers, educational institutions, public authorities and other persons specified by the candidate in order to comply with the legal requirements set out in Commission Regulation (EU) 2015/1998. For further information, please refer to paragraph 3.9 of this Privacy Notice.
- Data processors which perform certain works and/or provide services (information technology companies that process data to ensure the development, improvement and maintenance of information systems; companies that ensure sending messages to customers, provide security and other services, companies that administrate online pilot assessment systems);
- Credit and debit card service providers used to facilitate payment transactions related to the provision of services, banks and other credit and/or payment institutions;
- Professional advisors, notaries, auditors, lawyers and/or financial advisers;
- Bailiffs, other state officers, authorities and private counterparties providing legal and/or debt recovery services, successors of claim right;
- Courts, law enforcement agencies or state institutions to the extent that such provision is determined by the requirements of legal acts.
- Insurance companies;
- UAB "Creditinfo Lietuva", other joint debtors' data file managers, financial services companies, telecommunications companies, debt management companies, and all other third parties with a legitimate interest;
- Airport operators, airfield operators, other third parties responsible for areas where the practical training part is conducted.

If Personal Data have to be transferred outside the European Economic Area, the party transferring personal data should comply with the requirements of Chapter V of the Regulation and other applicable legal acts.

8. INFORMATION ON WHAT DATA SUBJECT’S RIGHTS DO WE GUARANTEE TO YOU AND HOW TO EXERCISE THEM

The previous version of the Pilot Runway Program Privacy Notice: http://pilotrunway.com/storage/privacy_noticev2.pdf.

BAA guarantees the implementation of these rights and the provision of any related information at your request or in case of your query:

- to know (be informed) about the processing of your personal data.
- to get access to your personal data which are processed by us.
- to request correction or addition, adjustment of your inaccurate, incomplete personal data.
- to require the destruction of personal data when they are no longer necessary for the purposes for which they were collected.
- to request the destruction of personal data if they are processed illegally.
- to disagree (object) with the processing of personal data.
- to request to provide, if technically possible, your personal data in an easily readable format or request the transfer of data to another data controller.
- not to be subject to a decision based solely on automated processing, including profiling;
- to lodge a complaint.

In order to exercise your rights, please send us the request by e-mail: privacy@baatraining.com .

To learn more about how we process personal data, and your privacy rights please refer to our Privacy Policy <https://baatraining.com/privacy-policy/>.

9. AUTOMATED DECISION-MAKING

The personal data will not be used to make automated decisions about you, including profiling.

Decision-making based solely on automated means happens when decisions are taken about you by technological means and without any human involvement.

10. WHO SHOULD YOU COMPLAIN TO ABOUT BAA

BAA would appreciate the chance to deal with your concerns before you approach the supervisory authority so, please contact us in the first instance so that we can find the right solution. Our Data Protection Officer may be contacted via email: privacy@baatraining.com .

In case you disagree with personal data processing conducted by BAA, you have the right to make a complaint at any time to the competent supervisory authority.

Supervisory authority in Republic of Lithuania: State Data Protection Inspectorate, webpage <https://lrv.lt/lt/>; email address ada@ada.lt .

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11. WHO SHOULD YOU COMPLAIN TO ABOUT AIRLINE COMPANIES PARTICIPATING IN THE PROGRAM

If you are concerned about how your personal data is being processed by the airline company(-ies) participating in the Program, it is recommended in the first instance to contact the respective airline company (see contact details in Section 2 of this Privacy Notice).

In case you disagree with personal data processing conducted by airline company(-ies) participating in the Program, you have a right to make a complaint at any time to the competent supervisory authority. The list of supervisory authorities in each EU country may be found: <https://digital-strategy.ec.europa.eu/en/library/list-personal-data-protection-competent-authorities>.

CAUTION: THE INFORMATION IN THIS PRIVACY NOTICE ABOUT THE PROCESSING OF PERSONAL DATA CARRIED OUT BY AIRLINE COMPANIES ACTING AS INDEPENDENT DATA CONTROLLERS IN RELATION TO BAA IS INDICATIVE ONLY. TO RECEIVE ACCURATE AND DETAILED INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA BY THE AIRLINE COMPANIES PARTICIPATING IN THE PROGRAM, PLEASE CONTACT THE AIRLINE COMPANY(-IES) DIRECTLY.