



PRIVACY INFORMATION NOTICE

related to ESOP (Employee Share Ownership Plan)

Document issued on February 2025

Introduction

Airbus S.A.S. (also known as, "Airbus", or "we" or "us") appreciate your interest in our Employee Share Ownership Plan (also known as "ESOP"), that enables you to participate in the company's success through the acquisition of shares.

Airbus is committed to protecting the rights of individuals in line with applicable personal data protection laws and regulations. We want you to feel comfortable when participating in the Airbus ESOP.

This Privacy Notice will inform you of the Personal Data we process for the purpose of determining the eligible employees to participate in the ESOP, as well as the Personal Data we process when you access/use ESOP; how we use and disclose your Personal Data; how you can control the use and disclosure of your Personal Data; and how we protect your Personal Data.

Moreover, your application to ESOP may include the access to other websites or applications not covered by this Privacy Notice. In this event, we encourage you to carefully read the privacy policies of such ESOP partners.

What is Personal Data?

Personal Data is information that can be used to identify a person either directly or indirectly (hereinafter referred to as "Personal Data"). This definition covers a wide range of data enabling the identification of an individual.

Which sources and what Personal Data do we use?

Before you subscribe to the ESOP, the Personal Data we process under this Privacy Notice is as follows:

- ☐ Identification data: your name, maiden name, first name and your date of birth
- ☐ Professional data: your Airbus ID and your professional email address

If you subscribe to the ESOP, the Personal Data we process under this Privacy Notice are as follows:

- ☐ Identification data (e.g. your name, maiden name, first name, address and your email address, your date and place of birth, your nationality and your native language)
- ☐ Professional data (e.g. your Airbus ID)
- ☐ Economic & Financial data (e.g. your bank account number, the number of Shares purchased, payment status)
- ☐ Account information (role and permissions, log-in, password...)
- ☐ Digital Activity (user activity, browsing history...)

Please note that depending on the country of your workplace other categories of Personal Data are collected as required by law.

- Canada: national social security number
- China: sales proceeds and the amount of dividends relating to the Shares granted
- France: national social security number
- Germany: bank code and securities account number
- Malaysia: identity card or passport number, income tax number, amount of the subscription
- Morocco: the amount of your net salary and your identity card number
- Philippines: amount of the subscription
- South Africa: ID number, amount of the subscription
- Tunisia: identity card numbers, amount of the subscription
- United States: national social security number

We may receive this Personal Data directly from you, during your subscription to the ESOP services via the dedicated platform and indirectly from the relevant Airbus affiliate payroll team, acting as your employer.

What are the purposes of the processing of your Personal Data?

By using ESOP services, Airbus will collect and process your Personal Data for the following purposes (hereinafter referred as: the 'Purposes'):

1. *Eligibility to the ESOP*
 - We use your Personal Data to determine the eligible employees to participate in the ESOP and the available packages or subscription thresholds triggered by your ESOP payment engagement, as the case may be.
2. *Subscription to the ESOP*
 - We use your Personal Data to manage your subscription to the ESOP.
3. *Security.*
 - We use your Personal Data to implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect you, our partners and us.
4. *Communication.*
 - We use your Personal Data to communicate with you, including responding to requests for assistance. We can communicate with you in a variety of ways, including email.
5. *Legal and regulatory compliance.*
 - We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request, and proceed with applicable reporting with tax or exchange control administration.
 - We use/store your Personal Data in order to conduct internal audits, which are necessary to ensure we comply with our internal policies, as well as with every legal or regulatory provisions applicable to Airbus.

We will only use your Personal Data for the purposes for which we collected it. Where we intend to use your Personal Data for other purposes, we will notify you prior to this further data processing and provide you with a revised version of this Privacy Notice, or a separate privacy notice, as applicable.

What is the legal basis for the processing of your Personal Data?

Subject to the applicable law, we process your Personal Data under the following legal basis:

- ☐ **To comply with contractual obligations.**
 - To manage your subscription to the ESOP.
 - To communicate with you, including to respond to requests for assistance.

☐ **Within the scope of a legitimate interest.**

On occasion taking into account the minimum privacy impact for you, the processing of your Personal Data might be necessary for the following legitimate interests:

- To determine the employees eligibility to participate in the ESOP;
- To implement and maintain security, anti-piracy, fraud prevention, and other services designed to protect you, our partners and us;

☐ **On the basis of Airbus' legal obligations**

Airbus, as any other company, is subject to legal obligations and regulations. In some cases the processing of your Personal Data will be necessary for Airbus in order:

- To comply with applicable legal obligations, including responding to an authority or court order or discovery request, and proceed with applicable reporting with tax or exchange control administration.
- To conduct internal audits, which are necessary to ensure we comply with our internal policies, as well as with every legal or regulatory provisions applicable to Airbus.

☐ **As a result of your consent.**

Where a consent is required in accordance with applicable law, when you have consented to the processing of your personal data for the purpose of subscribing to the ESOP services, you can withdraw your consent at any time by contacting us at dataprotection@airbus.com. For further information on the right of withdrawal, please see below Section "How to exercise your rights and/or contact Airbus in respect of your personal data?"

Who will receive your Personal Data?

- Airbus affiliates;
- Authorised persons working for or on behalf of Airbus and authorised trading account manager partners, on a need-to-know basis for the purposes as outlined in this Privacy Notice;
 - Société Générale Securities Services and UmanIT as the plan administrator (located in France)
 - Banks for share management (in relation to your country - please refer to the Employee Share Ownership Plan Rules for more information);
- Other authorised third parties in connection with any merger, reorganization, a sale of some or all Airbus assets, or a financing or acquisition of all or a portion of our business by another company; and
- Law enforcement or government authorities or other legal processes to comply with applicable law, including reporting to tax and exchange control administration, or in response to any subpoenas, court orders, or to establish or exercise our legal rights or to defend against legal claims.

Addendums relating to geographical areas of implementation:

- **Addendum Canada**
Please note that by default, the trading account manager in Canada is Computershare. As provided in the Airbus Employee Share Ownership Plan Rules, instead of Computershare, you may choose Société Générale as your trading account manager.
- **Addendum China**
Airbus will transfer some of your Personal Data (including sales proceeds and the amount of dividends relating to the Shares granted) to the State Administration of Foreign Exchange to comply with its legal obligations.
- **Addendum France**
Personal Data collected will be processed by Amundi to allocate the shares on your Airbus group collective saving plan as selected during the subscription. To that extent, Amundi collects your national security number in order to comply with its legal obligations under the Social Security Code.
- **Addendum Germany**
As provided in the Airbus Employee Share Ownership Plan Rules, instead of Société Générale, you may choose Commerzbank as a trading account manager. If so, Commerzbank will process your Personal Data in accordance with this Privacy Notice.

- **Addendum Malaysia**
Airbus or your employer will collect and transfer your Personal Data (including your name, your identity card or passport number, your income tax number, your address, the number of shares that you subscribed to and the amount of your subscription) to the Inland Revenue Board Malaysia to comply with its legal obligations.
- **Addendum Mexico**
Your employer will collect and transfer your Personal Data to the Ministry of Finance of Mexico (*Secretaría de Hacienda y Crédito Público*) to comply with its legal obligations.
- **Addendum Morocco**
Airbus will collect and transfer your Personal Data (including the amount of your net salary and your identity card number) to the Market Authority to comply with its legal obligations.
- **Addendum Philippines**
Airbus will collect and transfer your Personal Data (including the number of shares that you subscribed to and the amount of your subscription) to the Securities and Exchange Commission to comply with its legal obligations.
- **Addendum South Africa**
Airbus may need to transfer to South African Reserve Bank your Personal Data (including the number of shares that you subscribed to) to comply with its legal obligations.
- **Addendum Tunisia**
Airbus needs to comply with the applicable regulations and file an application on your behalf to obtain an authorization from the Central Bank of Tunisia and be required to report to the Central Bank of Tunisia subscriptions to ESOP. This application shall include your Personal Data, including national identity card numbers, address, amount of your subscription and number of Airbus shares that you hold in the Plan.
- **Addendum UK**
As provided in the Airbus Employee Share Ownership Plan Rules, instead of Société Générale, you may choose Equiniti as a trading account manager. If so, Equiniti will process your Personal Data in accordance with this Privacy Notice.
- **Addendum USA**
Please note that by default, the trading account manager in the USA is Computershare. As provided in the Airbus Employee Share Ownership Plan Rules, instead of Computershare, you may choose Société Générale as your trading account manager.

Which countries and/or regions will Airbus transfer your Personal Data to?

Except for Airbus Affiliates operating outside the European Economic Area or the UK, your Personal Data will mainly be processed in the European Economic Area and/or in the UK.

We might exchange your personal data within Airbus and its Affiliates in relation to the ESOP campaign. In such cases, such transfers of your personal data within Airbus are covered by an intra-group agreement (Binding Corporate Rules). The Binding Corporate Rules includes contractual protections to ensure that your Personal Data receives an adequate level of protection wherever it is transferred within Airbus.

We may share some personal data to third parties located outside the European Economic Area and the UK for the strict purpose of the ESOP Services, subject to take at least one of the following steps to ensure that any transfer of information is carefully managed to protect your privacy rights:

- We may transfer Personal Data to countries which are recognised as providing an adequate level of legal protection,
- Where transfers are made to service providers and/or other third parties located outside the European Economic Area in a country which does not benefit from an adequate level of protection, we will ensure that adequate safeguards are in place to frame the transfer, including by contractual commitments (such as the European Commission-approved Standard Contractual Clauses) or other legally acceptable mechanisms that ensure an adequate level of protection,
- any requests for personal data information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed and carried out in compliance with applicable data protection laws, and

- If you are located in China, we will ask for your consent prior to any international transfer of your Personal Data.

If you have any questions regarding transfers or if you want to be provided with a copy of the safeguards implemented, please contact us (dataprotection@airbus.com) for further details.

For how long will your Personal Data be stored?

We will retain your Personal Data for as long as necessary to for the Purposes, as further described below:

Purpose	Data retention period
Eligibility to the ESOP	Until (i) the end of the ESOP campaign, or, as the case may be, (ii) implementation of your request to have your Personal Data removed, subject to applicable legal obligations of conservation and statutes of limitations.
Subscription to the ESOP	For the whole duration of the subscription, subject to applicable legal obligations of conservation statutes of limitations.
Security	For the whole duration of the subscription, subject to applicable legal obligations of conservation statutes of limitations.
Communication	- If you subscribe to the ESOP: for the whole duration of the subscription, subject to applicable legal obligations of conservation and statutes of limitations. - If you do not subscribe to the ESOP: Until (i) the end of the ESOP campaign, or, as the case may be, (ii) implementation of your request to have your Personal Data removed, subject to applicable legal obligations of conservation and statutes of limitations.
Legal and regulatory compliance	For the whole duration of the applicable legal and regulatory obligations.

What about the security of your Personal Data?

We use technical and organizational security measures in order to protect the Personal Data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

All Airbus' data processors are required to take appropriate security measures to protect your Personal Data in line with this policy.

What are your rights?

You may at any time exercise your data protection rights as listed below (under some circumstances provided by law) by contacting us at dataprotection@airbus.com :

- **Right to access/obtain a report detailing the Personal Data held about you:** You have the right to obtain confirmation as to whether or not your Personal Data is being processed by Airbus and if so, receive a copy of that Personal Data along with certain other information about the processing made on your Personal Data.
- **Right to correct Personal Data:** You have the right to rectify or request to have rectified any inaccurate Personal Data concerning you.
- **Right to be forgotten:** In some cases, for instance, when the Personal Data is no longer necessary in relation to the Purposes for which they were collected, you have the right for your Personal Data to be erased.

- **Right to restrict the processing of your Personal Data:** You have the right to restrict the processing of your Personal Data, for instance when the processing is unlawful and you oppose the erasure of your Personal Data. In such cases, your Personal Data will only be processed with your consent or for the exercise or defense of legal claims.
- **Right to data portability:** You have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format and/or transmit those Personal Data to another data controller.
- **Right to object:** In some cases required by law, you may ask us to stop processing your Personal Data.
- **Right to define guidelines after death (French law):** Under French law, you have the right to define guidelines on what happens to your personal data after your death.
- **Right to withdraw consent:** Where your consent is required under applicable law, you may at any time withdraw such consent by contacting us at the contact details in section “How to exercise your rights and/or contact Airbus in respect of your Personal Data?”. However, please note that if you withdraw your consent, you may not be able to access and use certain information, features or services as described in section “Are you obliged to provide your personal data?”.
- **Right to lodge a complaint with the data protection authority:** You have the right to report any concern you may have regarding the processing of your Personal Data under this Privacy Notice to the competent data protection authority, notably that of your place of work. In France, the competent data protection authority is the CNIL.

Additionally, you have the possibility to request that your Personal Data be removed from the processing maintained for the purpose of establishing the list of eligible employees to the offerings proposed within the framework of ESOP. If you make such a request, you could no longer participate in the ESOP.

Are you obliged to provide your Personal Data?

Your Personal Data are strictly necessary to subscribe to ESOP and/or to comply with legal obligations. Any failure to provide the requested Personal Data may result in us not being able to fulfil our contractual/legal obligations and thus to subscribe to the ESOP.

Are your Personal Data the basis for automated decision-making, including profiling?

As a matter of principle, we do not use fully automated decision-making processes or profiling. In the event that we should use such processes, we will advise you in advance.

How to exercise your rights and/or contact Airbus in respect of your Personal Data?

If you are unhappy with the way in which your Personal Data has been processed or should you have questions regarding the processing of your Personal Data, you may refer in the first instance to the Airbus Data Protection Officer, who is available for enquiries or complaints, at the following email address:

dataprotection@airbus.com.

Additional Notice

for California Residents

In addition to the information provided above, the following section is made specifically pursuant to the California Consumer Privacy Act of 2018 (“CCPA”).

We don't sell your personal information to third parties and we will not sell your personal information to third parties unless provided otherwise by a specific privacy notice. We do not discriminate against California residents who exercise their CCPA privacy rights. To exercise your California privacy rights please refer to the section "How to exercise your rights".

for Chinese residents

By subscribing to the ESOP services, your personal information will be transferred to Airbus SE and its Affiliates located outside of China and will be processed in accordance with this privacy notice. We will comply with the applicable obligations and requirements under Chinese PIPL regulation in relation to sharing and cross-border transfers of personal information.

Modification of the Privacy Notice

Airbus will update this Privacy Notice from time to time in order to reflect the changes in our practices and services and also to remain compliant with data protection laws and regulations. We will inform you of any substantial modification in how we process your Personal Data.