

# Bristow Group Global Privacy Statement

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## 1.1 PURPOSE

Bristow Group is committed to protecting the privacy of Personal Information we may collect or obtain in the course of business from individuals inside or outside the organization. This Global Privacy Statement (“Privacy Statement”) describes the type of Personal Information Bristow Group may collect, how we may use and share that information, and how you can correct or change such information.

## 1.2 SCOPE

This Privacy Statement describes the ways Bristow Group manages Personal Information it receives: (i) in the course of its operations involving the transportation of passengers for offshore oil and gas, search and rescue, medevac, and other purposes (collectively, “Passengers”); (ii) from visitors of Bristow Group offices, websites, or events; (iii) from prospective employees in connection with employment applications; and (iv) in the course of interactions with its current, prospective, and former suppliers, vendors, subcontractors, and business partners (collectively, “Suppliers”). All individuals and entities that process Personal Information on behalf of Bristow Group are expected to protect Personal Information in adherence to this Privacy Statement.

Our Personnel Data Privacy Notice governs the management of the Personal Information of our personnel and shall control in the event of a conflict with this Privacy Statement.

## 1.3 KEY TERMS

- “Controller” has the meaning set forth in the Regulation (EU) 2016/679 (“GDPR”).
- “Data Protection Laws” means the European Economic Area which is currently composed of the following thirty-one (31) countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Italy, Ireland, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and United Kingdom. The term shall also include Guernsey.
- “GDPR” means Regulation (EU) 2016/679.
- “Bristow Group” means Bristow Group Inc. and all of its controlled subsidiaries and affiliates.

- “Personal Data” or “Personal Information” has the meaning set forth in the GDPR.
- “Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, acquisition, holding, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- “Processor” has the meaning set forth in the GDPR.
- “Third Party” is any natural or legal person, public authority, agency, or body other than the Data Subject, Bristow Group, or Bristow Group’s agents.

## **2.1 PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT**

The types of Personal Information we may collect (directly from you or Third Parties) depends on the nature of the relationship that you have with Bristow Group and the requirements of applicable law. We collect only information relevant for the purposes of Processing. We do not engage in automated decision making when Processing your Personal Information. Below are the legal bases for Processing Personal Information, some of the ways we collect information and how we use it.

### **Passengers**

The information Bristow Group collects from, or on behalf of, its offshore oil and gas Passengers includes name, business or company affiliation, and body weight. The information is used for flight planning purposes and to generate manifests that are used by Bristow Group personnel to satisfy civil aviation regulatory requirements and safely and efficiently operate our aircraft.

The information Bristow Group collects from Passengers transported on our aircraft for search and rescue, medevac, or other related purposes may include name, date of birth, gender, other biographical data, and health information. The information may be used to provide in-flight medical care to such Passengers, including in life or death situations, and may thereafter be transferred to other Third Party medical providers after the flight. Passenger names are redacted from all records otherwise containing Personal Information that are stored by Bristow Group.

### **Suppliers**

The information Bristow Group collects from its Suppliers relates to the management of these relationships and the exchange of requested services and products. Such information may include title, name, address, phone number, email address, invoicing and other payment information, and agreements executed with Bristow Group.

We Process Personal Information about Suppliers for a variety of business purposes, including but not limited to:

- Generally managing Supplier information
- Responding to questions and requests
- Verifying Supplier identity
- Communicating about Supplier accounts and activities
- Processing payments for products or services purchased by Bristow Group
- Developing new services, products, and processes
- Further purposes disclosed at the time Suppliers provide Personal Information, or otherwise with consent of the Supplier

### **Visitors**

If you visit a Bristow Group base or office, we may collect Personal Information about you, including but not limited to your title, name, address, phone number, email address, business or company affiliation, government identification (driver's license, passport), and other details you provide. We Process this information for a variety of purposes, including to verify your identity, to provide access to Bristow Group facilities and systems, for security and other safety purposes, to communicate with you regarding your visit, to provide information we believe may be of interest to you--including information regarding Bristow Group's services, and for purposes disclosed at the time you provide Personal Information, or otherwise with your consent.

### **Recruiting**

If you submit Personal Information via the Careers section of our website, or otherwise to inquire about or apply for a position at Bristow Group, we will Process such Personal Information solely for the purposes of considering applications and recruitment (and for purposes of our administration or management if you commence work for Bristow Group) and not to market to you.

### **Online Requests**

Bristow Group may collect Personal Information that you provide through its website for purposes of requesting investor materials. We collect only Personal Information that you provide to us and only for purposes of fulfilling your request for information. Bristow Group does not sell or otherwise provide your Personal Information to Third Parties.

### **Social Media Activities**

Bristow Group may collect Personal Information to enable Data Subjects to use online social media resources, which may include posting or sharing Personal Information with others.

When using these resources, you should consider what Personal Information you share with others.

### **Information From Third Party Sources**

Bristow Group may collect information about you from Third Party sources to supplement information provided by you. This supplemental information allows us to verify or supplement information that you have provided to Bristow Group and to enhance our ability to provide you with information about our business and services. Bristow Group's agreements with these Third Parties typically limit how Bristow Group may use this supplemental information.

## **2.2 ONWARD TRANSFER**

### **Information We Share**

Bristow Group does not sell or otherwise disclose Personal Information about you. Bristow Group may share Personal Information with our service providers and consultants for our internal business purposes or to provide you with a service that you have requested. Bristow Group requires our service providers to agree in writing to maintain confidentiality and security of Personal Information they maintain on our behalf--including to provide at least the same level of protection as required by the Privacy Shield Principles and GDPR--not to use it for any purpose other than the purpose for which Bristow Group retained them, and to notify Bristow Group if they make a determination that they can no longer comply with that obligation.

We may disclose information about you: (i) if we are required to do so by law, court order, or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation or arbitration; (iv) to enforce Bristow Group policies, contracts, or other rights; (v) to collect amounts owed to Bristow Group; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if in good faith we believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes--e.g., to detect unauthorized activity on the website. In such cases, server log data containing IP addresses may be shared with law enforcement bodies, contractors, or consultants so that they may identify users in connection with their investigation of the unauthorized activities.

We reserve the right to disclose or transfer any information we have about you in the event of a proposed or actual reorganization, sale, lease, merger, joint venture, assignment, amalgamation, or any other type of acquisition, disposal, or financing of all or any portion of Bristow Group or of any of our assets--including should Bristow Group cease to trade, become insolvent, or enter into receivership or any similar event occur. Should such an event take place, we will endeavor to direct the transferee to use Personal Information in a manner that is consistent with this Privacy Statement.

## **Data Transfers**

Your Personal Information may be transferred to other Bristow Group offices, data centers, and servers in Europe, Australia, Africa, or the United States for the purposes identified. Any such transfer of Personal Information shall take place only in accordance with applicable law.

Bristow Group will take steps designed to comply with all applicable local laws when Processing Personal Information, including any local law conditions for and restrictions on the transfer of Personal Information. Bristow Group may also protect your data through other legally valid methods, including international data transfer agreements.

## **Persons Located Within the EEA**

Bristow Group takes steps to ensure that appropriate technical and organizational security measures and safeguards are applied when transferring personal information outside of the EEA and that privacy rights outlined in this Policy are preserved. Bristow Group has established Standard Contractual Clauses that have been recognized by EEA Data Protection Authorities as providing an adequate level of protection to the Personal Information we Process globally. Bristow Group ensures that all transfers of Personal Information are subject to appropriate safeguards as defined by the regulation.

## **2.3 INDIVIDUAL RIGHTS OF ACCESS AND CHOICE**

Subject to applicable law, you may have the right to obtain confirmation regarding whether Bristow Group Processes Personal Information about you, request access to and receive information about the Personal Information we maintain about you, receive copies of the Personal Information we maintain about you, update and correct inaccuracies in your Personal Information, object to the Processing of your Personal Information, and have the information blocked, anonymized, or deleted, as appropriate. The right to access Personal Information may be limited in some circumstances by local law. To exercise these rights, please contact us at [dataprivacy@bristowgroup.com](mailto:dataprivacy@bristowgroup.com).

Where otherwise permitted by applicable law, you may use any of the methods set out in this Privacy Statement to request access to, receive (port), or restrict Processing, seek rectification, or request erasure of Personal Information held about you by Bristow Group. Such requests will be processed in line with applicable laws. Although Bristow Group makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which Bristow Group is unable to provide access--including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the information is commercially proprietary. If Bristow Group determines that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Bristow

Group will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

### **Persons Located Within the EEA**

Bristow Group adheres to applicable Data Protection Laws in the EEA which if applicable, practicable, and required under the GDPR include the following rights:

- If the Processing of Personal Information is based on your consent, you have a right to withdraw consent at any time for future Processing.
- You have a right to request from us, where we act as a Controller as defined in the law, access to and rectification of your Personal Information.
- You have a right to object to the Processing of your Personal Information.
- You have a right to lodge a complaint with a Supervisory Authority.

When we Process Personal Information about you, we do so with your consent or as necessary to provide the products you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our Clients, or fulfill other legitimate interests of Bristow Group, or otherwise as described in Section 2 (“Policy”) above. When we transfer Personal Information from the European Economic Area, we do so based on a variety of legal mechanisms, as described in Section 2.2 (“Onward Transfer”) above.

## **2.4 RETENTION**

Bristow Group retains Personal Information that we receive for as long as necessary to fulfill the purpose(s) for which the information was collected: to provide our services and products and to resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with all applicable laws.

## **2.5 SECURITY**

The security of all Personal Information provided to Bristow Group is important to us and we take reasonable steps designed to protect your Personal Information. Bristow Group maintains administrative, technical and physical safeguards designed to protect Personal Information that is received against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

## **2.6 OTHER RIGHTS AND IMPORTANT INFORMATION**

### **Changes to this Privacy Statement**



Bristow Group may update this Privacy Statement from time to time as it deems necessary or appropriate in its sole discretion. If there are any material changes to this Privacy Statement, Bristow Group will notify you by email, by means of a notice on our website, or as otherwise required by applicable law. Bristow Group encourages you to review this Privacy Statement periodically to be informed regarding how Bristow Group is using and protecting your information and to be aware of any policy changes. Any changes to this Privacy Statement take effect immediately after being posted or otherwise provided by Bristow Group.

## **2.7 CONTACT US**

If you have any questions or comments regarding this Privacy Statement or Bristow Group privacy practices, or if you would like us to update information you provided to us, you may contact us at [dataprivacy@bristowgroup.com](mailto:dataprivacy@bristowgroup.com).

*Effective date: June 5, 2018*