



AURORA
TECHNOLOGY

Privacy Policy



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Issue Record

Issue	Issue Date	Sections Affected	Relevant Information
1.0	25/05/2018	All	First doc release for GDPR compliancy
1.1	25/04/2021	All	Full privacy policy merged with the Recruitment Privacy Policy
1.1.1	14/05/2021	Sec.7	Minor updates to the text

NOTICE

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Introduction

The EU General Data Protection Regulation (GDPR) applies to companies that process data of EU residents. This covers EU organizations and non-EU companies that offer goods or services to EU residents or monitor their behavior.

We appreciate the trust you place in Aurora Technology when sharing your personal data. The security of your personal data is very important to us.

In the following sections, we will explain how we collect, use and protect your personal data. We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

This Privacy Policy applies to the personal data of our website User, candidates, clients, suppliers, and other people whom we may contact in order to find out more about our candidates. It also applies to Aurora's employees and the emergency contacts of our employees.

This Privacy Policy applies in relevant countries where we operate.

Terminology

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

ATS	Application Tracking System, where personal data from Data Subject(s) are stored and processed
Data	This includes both automated and manual data. Automated data means data held on computer, or stored with the intention that it is processed on computer. Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.
Data Controller (DC)	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.
Data Subject (DS)	A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.
Data Processor	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.
Data Protection Officer (DPO)	A person appointed by Aurora to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients
EU	European Union
GDPR	General Data Protection Regulation
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.
Personal Data	Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller.
Sensitive Personal Data	A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.
Partner companies	LSE Space, SSC
Prime/Subcontractors under current ESA Frame Contract	ATG Europe, Telespazio Belgium

1. WHO WE ARE

In this Privacy Policy, when we refer to “Aurora Technology”, “Aurora”, “us”, “we” or “our”, we mean the company which is responsible for any personal information collected about you.

Aurora Technology is a Dutch company with Kamer van Koophandel nr. 28076579, registered in Leiden – the Netherlands. We are firmly established within the Space industry as a support company providing a high level of service in the provision of engineering and scientific services. For additional information, you can refer to our website: <https://www.aurora.nl/>.

Aurora is fully owned by LSE Space GmbH (ref.: <https://www.lsespace.com/>). Both companies are part of SSC – Swedish Space Corporation (ref.: <https://sscspace.com/>).

2. HOW WE RECEIVE INFORMATION AND HOW WE MAY USE IT

We collect your personal data:

- If you apply for a role via our website or email your CV directly to Aurora recruitment team or being interviewed by our recruiters.
- In the normal course of our relationship with you; as soon as you have provided your personal data to us: this can be done by email, text message, verbally (by phone, skype, MS Teams, Webex, at an event, etc.), through giving us your business card or in any other possible way. (e.g. reports from your job interview).
- If you have made these data public on public/social media (e.g. LinkedIn) which could indicate that you are interested in work-related services.
- When you register as the point of contact for your company or organisation to know more about our services or products.
- When these are issued by third parties (e.g. recruitment agencies, your employer, job boards).
- When you visit our website (see our cookies policy) or as soon as you enter your data or leave it on our website <https://www.aurora.nl/> (e.g. subscription to our newsletter, specific question related to our products or services).

Next sections will specifically focus on Recruitment.

2.1 You apply to Aurora

Aurora mainly receives your personal data when you apply directly for an advertised role via our website; when you apply directly to be a candidate for whom we can facilitate a job search; or via a third party when you respond to a job post placed by Aurora on a job board on behalf of a third-party client (LinkedIn, Space-careers, etc...).

When you proactively apply with Aurora, you provide us with your personal data. As job applications correspond to actual (or potential, in case of open applications) job openings, we have legitimate interest in processing this data and we do not need to ask you for explicit consent. This mainly means that you automatically AGREE to giving us consent to collecting and storing your personal information, which will be used for recruitment purposes only. We will never process irrelevant data (e.g. cultural information) for recruiting process.

During telephone conversations and face to face interviews we may collect personal information regarding employment preferences, strengths and work experience which may be stored on your personal record. This information facilitates our ability to support your job search and to provide a basis for recommendation when short-listing candidates for a particular role. By applying proactively with Aurora, you are providing permission for our storage of this information.

Aurora will never share personal information or a Curriculum Vitae with a third party without your explicit consent. Typical situations when we will ask you such explicit consent are: 1) when we submit your application to our Client for evaluation; 2) when we share your application with our partner companies; 3) when we send your application to our Prime/Subcontractor under current ESA Frame Contract.

If you do not consent to Aurora storing your personal data, please do not submit your Curriculum Vitae or application. We are unable to process your application without you agreeing and granting consent to process and store your personal information.

We maintain the data (see section 9) and may use this data to see whether you are a suitable candidate for future positions, in which case we shall contact you again.

2.2 We actively Source Candidates

Since Aurora has a legitimate interest in processing personal data (as defined in section 5.1), we may source candidates, meaning that we can find and store personal data without directly asking them to the data subject. Gathering data from social profiles is legal under GDPR. Sourcing is an essential function for organisations that want to find great people. For example, we may assume that a publicly accessible LinkedIn profile indicates a reasonable expectation of contact (if in the profile, the contrary is not explicitly stated). Therefore, we will proceed to process candidate data for a maximum of 30 days.

If by sourcing candidates we then decide to keep their data, we will contact them within 30 days and say that we intend to keep data for recruitment purpose only and will provide them with our privacy policy.

3. PERSONAL DATA COLLECTED

We collect and process your personal details that are necessary to perform our service and desirable to better align our services to your expectations or to meet more specific questions or obligation coming from Aurora's clients.

This includes:

- Personal and contact details (name, address and contact details including email address and telephone numbers, age/date of birth, contact details, Sex/Gender, Marital status, nationality, language spoken).
- Details of your Training and Education History, qualifications, skills, experience and employment history.
- Copy of your ID or Passport:
- Family and emergency contacts
- Referee details
- Details about your availability, current level of remuneration including benefit entitlements such as company car, pensions, and benefits arrangements
- information about your entitlement to work in the EU or in the UK.
- Security information: security clearances required for specific client and/or role.

Aurora may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, application emails, internet platforms (such as LinkedIn, space-careers.com, etc...), obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We may seek information from third parties only after you have signed that you agree to the potential employment contract. This will not be done without your prior consent and knowledge.

We do not collect any Specific Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Subject to specific request from the client, we do collect information about criminal convictions and offences (Certificate of Good Conduct). When becoming our employee, the information will be requested by you to the competent authority, and we will store the outcome in our data system.

4. PURPOSES TO COLLECT YOUR PERSONAL DATA

The personal data we collect will be used for the following purposes:

- **Marketing:** To send you our latest news and our invitations to business events.
- **Travel Organization:** To organize your missions travelling on behalf of Aurora.
- **Recruitment activities:** To include you in our applicant's database for our recruitment activities.
- **Employee Administration:** To enter with you into an employment relationship to maintain it by carrying out the relevant administration tasks such as staff management, wage processing, insurance coverage, health and safety.
- **Commercial Transaction:** To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services.
- **Contractual Purpose:** To fulfil a contract arrangement with you or with the entity that you represent;
- **Legal Claim:** To help us to establish, exercise or defend legal claims.

5. LEGAL GROUNDS TO COLLECT AND HANDLE YOUR PERSONAL DATA

Aurora will collect, use and share your personal information only when this is legally justified.

We can summarize our relevant legal basis for processing your personal data as follows:

- **Your consent.** The data subject has given consent to the processing of his or her personal data for the specific purposes here-above;
- **Legal obligation.** The use of your personal data is required for complying with our legal file or obligation.
- **Legitimate Interests.** Aurora also processes your data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights.

Our legitimate interests include:

- selling and supplying services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behavior, activities, preferences, and needs;
- improving existing services and developing new products and services;
- handling customer contacts, queries, complaints or disputes; and
- fulfilling our duties to our customers, partners, colleagues, shareholders and other stakeholders.

Next sections will specifically focus on our Legitimate Interest.

5.1 Legitimate interest in processing personal data

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the EU or UK before employment starts.

Aurora has a legitimate interest in processing personal data during the **recruitment process** and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

If your application is unsuccessful, Aurora may keep your personal data on file (with your consent) in the event there are future employment opportunities for which you may be suited for. Upon informing you of your unsuccessful application we will therefore also request your permission to maintain your data.

Aurora has also a legitimate interest in processing personal data of its employees for administration purposes, meaning to enter with a successful candidate into an employment relationship and to maintain it by carrying out the relevant administration tasks such as staff management, wage processing, wellbeing at work, etc...

6. COOKIES

Aurora Technology uses a limited number of cookies to improve the way our site works. You decide whether you want to accept cookies or not.

For further information, please refer to: <https://www.aurora.nl/site-conditions/>

7. ACCESS TO DATA

Data will be stored in specific folders as well as in the emails used to communicate with you. Access to these data is controlled and limited to Aurora's recruitment team (for candidates) and management team (for employees).

As **Application Tracking System (ATS)** we use excel spreadsheets and store the information using Dropbox Business. We also use Moday.com both for Recruitment Process and for Company Management and Administration purposes.

We will not share your data with third parties without your explicit consent. For candidates, the nominal authorization is a signed Candidate Proposal Form.

In case you explicitly agree to share your data with third parties, we may: 1) eventually share your data with your provided references to obtain feedbacks about you; 2) we will also share your application with our Client for its evaluation; and 3) with our partner companies and Prime/Subcontractors under current ESA Frame Contract.

7.1 Dropbox

Aurora stores data in Aurora's Dropbox Business account with access control to uses. Dropbox has a high level of security (ref.: <https://help.dropbox.com/accounts-billing/security/how-security-works>).

In compliance with GDPR, the Dropbox server is located in Europe.

Dropbox offers Europe-based storage of file content for European customers. Our infrastructure is hosted by Amazon Web Services in Frankfurt, Germany and replicated within the Frankfurt region to ensure redundancy and protect against data loss.

Further info could be found here:

- [1] <https://www.dropbox.com/security/GDPR>
- [2] <https://help.dropbox.com/accounts-billing/security/general-data-protection-regulation>
- [3] <https://help.dropbox.com/accounts-billing/security/physical-location-data-storage>

7.2 Monday.com

Monday.com is compliant to the extent required on or before May 25, 2018 and will continue to comply on an ongoing basis. Monday.com hosts its customer data in Amazon Web Services (AWS) data centers in the US and in Germany.

The EU-US Privacy Shield ("Privacy Shield") is a framework for US-based organizations. monday.com Ltd is based in Israel and as such does not need Privacy Shield as Israel is a country that offers adequate level of data protection in accordance with an adequacy decision made by the EU.

Monday.com customers data is hosted by Amazon Inc. which is certified with Privacy shield. In addition, monday.com has a US entity (monday.com Inc.) that provides sales and customer success services for monday.com customers. This entity is Privacy Shield certified as well.

Further info could be found here:

- [1] <https://support.monday.com/hc/en-us/articles/360000733949-monday-com-and-GDPR>
- [2] <https://monday.com/l/privacy/monday-com-is-gdpr-ready/>
- [3] <https://monday.com/l/privacy/dpa/>

7.3 Norton 360

Aurora uses Norton to backup the data. We can choose which files are backed up. Within <https://www.symantec.com/en/uk/privacy> it states that:

If you live in the European Economic Area, the Controller of Your Data is Symantec Limited, Ireland, which has its principal place of business at Ballycoolin Business Park, Blanchardstown, Dublin 15, Ireland.

7.4 ABN AMRO Pension and Insurance

If you are an Aurora employee (or when you will become an employee) in the Netherlands, we will register you at the ABN AMRO Pensioenen.

ABN AMRO Pensioenen handles your personal data with care and only uses it for predetermined purposes [1]. These are laid down in the Code of Conduct for the Processing of Personal Data by Financial Institutions [2].

Further info could be found here:

- [1] https://mijnportaal.abnamropensioenen.nl/pdfs/Privacy_Statement_ABN_AMRO_Pensioenen_2018.pdf
- [2] <https://mijnportaal.abnamropensioenen.nl/#privacy-cookies>
- [3] <https://wetten.overheid.nl/BWBR0033201/2010-04-26>
- [4] <https://www.abnamro.nl/en/personal/overabnamro/privacy/explanation-privacy.html>

7.5 ATPI traveler profiles

If you are an Aurora employee (or when you will become an employee) and you will need to go on mission (business trip), we will need to create an ATPI traveller profile for you.

Please refer to:

- [1] <https://www.atpi.com/en/about/privacy/>
- [2] <https://www.atpi.com/en/about/gdpr-privacy-notice/>
- [3] <https://www.atpi.com/upload/media/default/0001/03/bd0c6d483cbd7426aa3da15c10386637af5aba09.pdf>

8. DATA PROTECTION

We take the security of your data seriously.

Aurora does everything in its power to optimally protect your personal information against unlawful use. We do this on the basis of physical, administrative and technological measures.

We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

9. DATA RETENTION PERIOD

General Principle:

Aurora guarantees not to keep your personal data for longer than required by law or such other period necessary to fulfil the purposes we collected them for.

For Applicants:

Due to the nature of our business, a significant number of candidates reconnect with our organisation periodically. It is not uncommon for this to occur years after they have already applied with us in the past. For this reason and in order to be considered for other job opportunities, Aurora will **retain your personal details for a maximum of 5 years** or until you wish us to delete your records from our database or refrain from further engagement. If any other opportunities become available which you may be interested in, we will contact you by email, telephone or MS Teams.

Prior to the end of that period, if you withdraw your consent, your data is deleted or destroyed.

After this initial period of 5 years, you will eventually get an e-mail asking you whether you authorize us to keep your personal information in our recruitment database or not.

- In case of a negative answer, we will delete all your personal data (including your contact details).
- In absence of reply we will only file your contact details for archives for a period of 5 years unless you decide to give us a new consent in the meantime.
- In case of a positive answer, we will again inform you by e-mail 5 years later that we will only file your data for archives for a period of five years due to certain statutory periods of limitation, unless you decide to give us a new consent.

If your application for employment is successful, personal data gathered during the recruitment process will be retained during your employment.

For Employees:

If you work or have worked at Aurora, we will save all your employment data (identification, performances, wage information, multifunctional declaration at the social security department, tax declaration, ...) for a period of **10 years after the end of your employment contract**. This is in order to satisfy a variety of social, fiscal and other legal obligations and periods of time limitation.

For marketing purpose:

Aurora will process and store personal data for 3 years.

10. DISCLOSURES OF YOUR PERSONAL DATA

Internal Disclosure:

Aurora may share internally your personal information with its affiliates where such disclosure is necessary to provide you with our services or to manage our business. Other companies in the SSC Group act as joint controllers.

External Disclosure:

Aurora may share your information with other third parties named in the following cases:

- Customers or trusted partners that work with us and require Identity Data and Contact Data for operations, business development, selling and support purposes.
- Service providers to assist us in updating our websites, improving products and services and responding to your requests.
- Professional consultant and advisers including public relations firms, market research and consulting companies, lawyers, bankers, auditors, consultants and insurers;
- Regulators and other authorities who require reporting of processing activities in certain circumstances, namely:
 - to comply with our legal obligations;
 - to exercise our legal rights (e.g. pursue or defend a claim); and
 - for the prevention, detection and investigation of crime.

Aurora will not pass on or sell your personal data to third parties for their own marketing purposes without first obtaining your consent.

Aurora shall give access to your personal information only to trusted partners or services providers who require the use of such information for business purposes. These third parties are entities for whom we have established they have adequate and sufficient data protection and security controls in place and with whom we have also implemented contractual obligations to ensure they can only use your data to provide services to Aurora limited to the purposes listed

above. Moreover, these third parties shall not use or process your Personal Data for any purpose other than to provide the Service to Aurora.

11. YOUR RIGHTS

While we are in possession of or processing your personal data, as a data subject, you have a number of rights. You have the:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances, you can ask for the data we hold about you to be erased from our records.
- **Right to processing restriction** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to object to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – In the event that Aurora refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in section 12 below.

If you would like to exercise any of these rights, please contact privacy@aurora.nl. We will process your request within **30 days**.

If you are a successful candidate and you become an employee, then we maintain your data in accordance with this policy as described in the previous sections.

12. COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Aurora, or about how your complaint has been handled internally by Aurora, you have the right to lodge a complaint directly with Aurora's Data Protection Officer (DPO). The detail of this contact is reported in section 13.

Alternatively, you can contact us by writing to us at:

Aurora Technology B.V., Zwarteweg 39, 2201 AA Noordwijk, The Netherlands.

If you remain unhappy with the handling of your data, you can complain to the courts of the EU member state where you reside, where you work, or where the alleged infringement occurred.

13. AURORA APPOINTED DPO

We have appointed **Ms. Diane Barton** as our Data Protection Officer, for monitoring and advising on Aurora's ongoing Privacy compliance, and serving as a point of contact on Privacy matters for data subjects and supervisory authorities. Our DPO may be reached at privacy@aurora.nl

14. NOTIFICATION OF BREACHES

In the unlikely event that our computer systems are compromised and there is a potential loss of confidentiality, we will report this breach to you.

In the unlikely event that personal data is taken or exposed from Aurora records without our consent, we will provide reports surrounding that exposure within **72 hours** of being notified of such an event and take any action necessary to restore security of your personal data.

15. CHANGES TO OUR PRIVACY POLICY

The privacy policy may be changed by Aurora at any time. Any changes to our Privacy Policy will be reported in this document and updated on our website.

It is important to point out that we can amend this Privacy Policy from time to time. Please make sure you visit our “privacy” page from time to time if you want to stay up to date.

16. CONSENT

By consenting to this privacy policy, you are giving us permission to process your personal data specifically for the purposes identified. Generally, Aurora do not rely on consent as a legal basis for processing your personal data in any other case than sending certain direct marketing communications to you via email or to perform active recruitment activities.

You may withdraw consent at any time by sending an email to: privacy@aurora.nl