

Public Data Protection Notice





Air Business - Who are we?

We are Air Business Ltd, a market-leader in global mail, e-commerce, fulfilment, distribution and subscription management, and a wholly owned subsidiary of An Post, the Irish Post Office. We are registered with The Information Commissioner's Office (ICO), the UK's authority and independent regulatory office for data protection, with registration number: Z5908656.

For data protection matters contact: The Data Protection Officer, Air Business Ltd, The Beacon, Mosquito Way, Hatfield, AL10 9WN. Or: DPO@airbusiness.com.

EU residents may contact our EU Representative at: Data Privacy Office, An Post, Room 2-172, GPO, O'Connell Street Lower, Dublin 1, D01 F5P2. Or: privacyoffice@anpost.ie.

Problem with a Subscription?

If you are here because of an issue with a subscription, such as for a publication like a magazine, please contact the company that you have an agreement with – they are responsible for your contract and your data.

Purpose of this notice

To inform you of the data we process as a controller; how it is collected, processed and protected. This fulfils specific General Data Protection Regulation (GDPR) requirements.

Key definitions

A few definitions are useful; these are summaries from **UK GDPR definitions**.

Term	Meaning
Controller	The person/company who determines the purposes and means of the processing of personal data.
Processor	The person/company who processes data as instructed by the controller.
Data Subject	An identified or identifiable living person.
Personal Data	Any information or data related to a 'data subject'.
Processing	Anything done with personal data, including storing, viewing, changing and destroying.

Who is this for?

Any person for whom we are the 'controller' of the data:

- Users of our website,
- Our existing clients,
- Prospective clients,
- People covered by our CCTV.

Air-Business-Public-Data-Protection-Privacy-Notice-2025-Sep

Version Control: 1.0

Last Modified: 10 Sep. 2025



We are also the controller for our employees, for whom we have the 'Data Processing Notice for Colleagues' available on our intranet or from The People Team.

Air Business Website Users - Cookies

We use limited 'legitimate interest' cookies on the airbusiness.com website:

- Essential technical cookies needed for our websites & services to operate correctly.
- Analytical cookies to help us understand how our website is used, so that we can improve functionality and user experience. This may include anonymous geographical identification data.
- We do not use any form of cross-site tracking cookies.

We run several websites for clients; this notice is not applicable to those websites. Each client, as controller, is responsible for a site relevant notice.

Air Business Website Users - Webforms

When you submit a form on our website you 'consent' to us using your data as described on the form. You have the right to withdraw consent at any time, and all other rights as described later in this Notice. We may also generate anonymous statistics.

Air Business potential clients using data from a third party

We have services that we hope will help your business, but which you don't yet know about. It is our 'legitimate interest' to tell you about those services in the hope of working with you to our mutual benefit. In compliance with <u>GDPR Art.14</u>, items not covered elsewhere in this document:

- Data categories name, business contact (email, phone), role, company.
- Recipients we use your data directly not passing on. We use third-party tools as required: CRM SaaS, email, security providers.
- There is no transfer to a third country; all SaaS and other services are within UK/EEA.
- We will retain your data until we know it is no longer relevant. If you object to us contacting you, we can mark it 'do not contact'; we recommend this over erasing it.
- We are not using Consent as the Lawful Basis.
- We obtained the data from a trusted partner, from publicly available data.
- No automated decision making is used.

Air Business existing clients

We hold information in support of our mutual 'contract'; this is predominantly business data. The personal data is:

3

- Name.
- Email address,
- Phone number,
- Correspondence.

Air-Business-Public-Data-Protection-Privacy-Notice-2025-Sep

Version Control: 1.0

Last Modified: 10 Sep. 2025



We hold the data while a 'contract' exists between our businesses and a further 7 years as a 'legitimate interest' to support or defend any potential claim.

Air Business CCTV, with public impact

We have a 'legitimate interest' to protect the people and property of Air Business including property under our care; this will become 'recognised legitimate interest' ('crime condition') under the Data (Use and Access) Act 2025, when the relevant part comes into force.

To assist us in this aim, in common with many businesses, we operate CCTV with no audio. Recordings are held for 30 days, those in high security areas are held for 90 days. We do not routinely analyse CCTV and do not use facial recognition.

If an incident requires investigation, we may review recordings. This may result in a copy being made and kept separately until the conclusion of that investigation process.

Recordings may be provided to relevant authorities on the presentation of satisfactory documentation such as a court order.

In the event of a technical issue the system may be accessed by our system provider.

Courtesy for clients

Mostly we are 'processors' instructed by our clients, the 'controllers', to send packages and fulfil orders, which requires data processing. As a courtesy for clients, we have created this generalised simplified notice of the processing we do. The authoritative notice is available from the relevant controller.

Data we process for Controllers:

Data Processed	Purpose
Name, contact details (address, email, phone)	To communicate with you. To send you goods or services.
Identity data (date of birth, shared secret)	To verity your identity.
Account #, Subscription #, Shipping #	To collate related information.
Emails	Correspondence
Description of service or goods, with categorisation and value.	Describes the contract service or goods. When shipping internationally, this may need to be supplied to other shipping companies and to Customs (a Legal Obligation).

We hold the data only as long as required by the Contract with our client. In the case of a delivery, this normally includes a Legitimate Interest period of 3-12 months after delivery to support potential queries or claims related to the service provided.

Air-Business-Public-Data-Protection-Privacy-Notice-2025-Sep

Version Control: 1.0

Last Modified: 10 Sep. 2025



Principles

The ICO - the UK authority on data protection - is the best source for understanding: The principles | ICO, the Lawful basis for processing | ICO, and What is personal data? | ICO.

We wholeheartedly support the protection of "fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data" Art.1(2), which is why we seek full compliance with GDPR, related laws and regulations, and train our staff to understand and actively maintain data protection. We know if we get it wrong it could hurt you, our people and our business – we are serious about data protection.

Your rights

You have rights, as a 'data subject', to the personal data that relates to you. We fully support these rights. For detailed information see <u>Individual rights | ICO</u>.

Your rights on request to the controller: to be informed about your data, access to your data, rectification of your data, erasure of your data, restricting the processing of your data, data portability, object to processing of your data and rights regarding automated decision making.

If you have contacted us and continue to be dissatisfied, you have the right to complain to the UK regulator - the Information Commissioner's Office (ICO): Make a complaint | ICO.

Data processing, sharing, and security

We are committed to ensuring the security and confidentiality of all personal data we process, using and certified to the internationally recognised standards:

- ISO/IEC 27001 for information security management
- PCI-DSS for secure handling of payment card data

These frameworks guide the implementation of robust controls across all forms of data transfer and communication, whether electronic, physical, or verbal.

International transfers

Many countries do not have the same concept of 'rights and freedoms' of people. To protect your data, we avoid sending data to countries that have lower levels of legal protection, however, it is sometimes necessary. When this is the case, we will take additional steps to protect personal data:

- 1. We carry out a Transfer Risk Assessment (TRA) and only if we are satisfied data can be adequately protected, then:
- 2. We use the ICO and UK government approved legal documents, to provide strong contractual protection.

Laws and Regulation

As a UK registered company, UK Laws apply, in particular <u>Data Protection Act 2018</u>, <u>UK GDPR</u>, Brexit withdrawal act, and <u>Data (Use and Access) Act 2025</u>.

Air-Business-Public-Data-Protection-Privacy-Notice-2025-Sep

Version Control: 1.0

Last Modified: 10 Sep. 2025



Air Business Limited
The Beacon, Mosquito Way, Hatfield,
Hertfordshire AL10 9WN