



Last Updated: 13 November 2018

**Gogo Employment Privacy Notice**

We are committed to protecting the personal information of our current, former, and prospective Gogo personnel. On this page, you can find our privacy policy for protecting and holding your personal data. We are an international company with employees around the globe and privacy requirements differ between countries. This notice encompasses our general practices and if you have any specific questions not answered here, please contact us at [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com) or speak with your HR representative.

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[gogoair.com](http://gogoair.com)

**What personal data do we collect on prospective new hires?**

Whether you apply to us directly through our website, an outside website, or if one of our recruiters reached out to you, we will collect personal data about you, such as what you include on your CV, resume, application, or LinkedIn profile. We use this information to evaluate you throughout the recruitment process and it is only shared internally. We may also use the personal data you provide to evaluate you for other opportunities within Gogo.

When you use the Gogo websites, we use cookies to enhance your experience on our sites. Cookies are data files placed on a device when it is used to visit websites ("Cookies"). For example, we may use Cookies to collect and store certain information to facilitate your use of our sites. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them). The types, use, and duration of the Cookies used are as follows:

| Type of Cookies    | Purpose of Use   | Duration  |
|--------------------|--|---|
| Session Cookies    | Session Cookies ensure that you are recognized when you move from page to page within the Sites and that any information you have entered is remembered. For example, session Cookies ensure that items placed in a shopping basket don't disappear by the time you reach the checkout. You can choose not to accept session Cookies by changing the settings in your browser.   | Session Cookies expire once you close your web browser. |
| Persistent Cookies | <p>Persistent Cookies help the Sites remember your information and settings when you visit them in the future. This results in faster and more convenient access.</p> <p>Features of the Service made possible by persistent Cookies include: authentication, language selection, theme selection, menu preferences, internal site bookmarks or favorites, among others. Cookies may enhance your online experience by saving your preferences while you are visiting a particular Site.</p> <p>Persistent Cookies also allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are using the Services.</p> <p>We currently use a third party ad network to serve Cookies in the United States; and we may partner with</p> | Eternal, unless deleted by the user.                    |



|  |   |  |
|--|---|--|
|  | third party ad networks to serve our Cookies in the European Union, Canada and other jurisdictions. |  |
|--|---|--|

If you would prefer not to accept Cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a Cookie, at which time you can choose reject it by; (ii) disable existing Cookies; or (iii) set your browser to automatically reject any Cookies.

You can also learn more about Cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org), which includes additional useful information on Cookies and how to block Cookies using different types of browsers.

We may also include web beacons (also known as Internet tags, pixel tags, tracking beacons and clear GIFs) with the content and ads that we deliver to you, which we will use to collect information regarding your interaction with such content and ads. A web beacon is a transparent graphic image placed on a web page or in an email, which indicates that a page or email has been viewed or that an email has been forwarded. In addition, a web beacon allows third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the information in Cookies set by third parties. A web beacon may also tell your browser to get content from another server.

We do not require sensitive personal data to evaluate your application, but if you provide us with such information, we may use it to help process your employment application and to comply with our legal obligations. For applicants within the US, we will ask you for certain sensitive data as so that we can fully comply with our Equal Employment Opportunity requirements. If you do provide us with any sensitive personal information, you consent to us processing such information as described in this notice.

In compliance with our security protocols, we will require you to complete a background check upon being hired, or possibly during the recruitment process. Any information we acquire during your background check is used solely for employment purposes and will be kept confidential. If you fail to complete your background check or fail to supply the correct form, then we may stop considering your application or terminate your employment. Our background checks are carried out by a third-party provider and we ensure that both we and the third-party comply with all relevant laws in conducting any background check and handling of your personal data.

If you are not offered a position with us, we may choose to retain your application information for up to three-years after the application process is complete and may consider you for other opportunities at Gogo. After the three-year period, we will anonymize your personal information if you have not yet joined Gogo. We will retain a record that you applied for a position.

**What personal data do we hold about our current employees?**

When you join Gogo, we will ask you for additional information about you and your family. We only ask for this information as it is necessary to administer your benefits, payroll, and other essential HR functions. When you join us, we can provide you with further information on the processing of any information we collect for employment or benefits purposes.



Some of the information we might ask for and collect during your time at Gogo includes:

- Contact details, such as your home address, telephone numbers, personal e-mail address, etc., and contact details of others, such as emergency contacts, your dependents and your beneficiaries;
- Financial information relating to your compensation, benefits, and retirement, such as details of your salary and any deductions, bank account, government identity numbers, travel expenses, etc;
- Employment administration information, such as career history, photograph, time entry records, performance information, training records, records of projects you have worked on, etc;
- Audit logs about your use of Gogo's facilities and assets (such as keycard access and IT hardware, which we collect for security purposes);
- Information that may reveal race or ethnic origin, such as for diversity and inclusion programs. We may also retain information about your religious or philosophical beliefs, or trade union membership, where it is necessary for compliance with regulatory requirements, as well as your health information for the provision of healthcare benefits or medical leave; and
- Other information you voluntarily provide that it is necessary to use for Gogo's business purposes.

We use your personal data as described above for employment and business-related purposes. This includes administration (paying salaries, leave benefits, retirement account or pensions, among others). We also use your data to provide you with training and to assess your performance. We monitor compliance in accordance with the relevant laws, such as equal opportunity employment.

Any information we collect about you during your employment follows the relevant law and we hold onto this information only if required by our compliance obligations. We use certain third-party providers to help us with our HR functions. Currently, these providers include Microsoft, Amazon Web Services, Workday, Slack, and Concur. More details of who we use and why will be provided to you when you join.

#### **What personal data do you keep about former employees?**

We hold your employee data file after you leave Gogo in accordance with our security certification and local legal requirements.

If you want to access, correct, delete, or limit the use and disclosure of your personal data in our possession, please contact us and we will respond with the applicable requirements. If we cannot delete your data because of legal restrictions, we will let you know. These services are provided free of charge. Please contact us as indicated at the end of this notice or by email to [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com).

#### **What personal data do we keep about vendors, contractors, or other external users?**

When you start working with Gogo, we will ask you for additional contact and personal information to administer you're the essential HR and security functions as necessary for your interaction with us. If you use our learning management system for training, then we collect your user activity and credentials to track your progress. This tracking is necessary to comply with our contractual and regulatory requirements when working with external users. Any personal data we collect is held to the same standard as our employee data. As each external user interaction is



slightly different, we can provide you with further information on the processing of any personal information we collect upon request. Please email [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com).

### **Our Legal Basis for Processing Your Data**

We will only process your personal data where we have a legal basis for doing so. In each case, the legal basis will be one or more of the following:

- To administer the employment relationship and perform the contract of employment that we may have with you (if applicable)
- To comply with our legal obligations as an employer;
- To fulfill our legitimate interests as an employer; or
- To process in conformance with your consent.

### **What are your rights?**

You have the right to send us a request to access, correct, delete, or limit the use and disclosure of your personal data in our possession and we will respond in accordance with the applicable requirements. If we cannot complete your request due to legal restrictions or because we cannot locate your data, we will let you know. These services are provided free of charge.

If after you have contacted us, you still have any unresolved issues and you live in the European Union or Switzerland, then you may contact your local Data Protection Authority for more information. The local Data Protection Authorities are a public service provided at no cost to you. For more information, please visit [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

### **Is your data transferred internationally?**

We are headquartered in the United States. Personal data may be accessed by us or transferred to the United States or to our affiliates elsewhere in the world. By providing us with personal data, you consent to this transfer. We will protect the privacy and security of your personal data according to this privacy statement, regardless of where it is processed or stored. However, by providing us personal data you, acknowledge that personal data stored or processed in the United States will be subject to the laws of the United States, including the ability of governments, courts or law enforcement or regulatory agencies of the United States to obtain disclosure of your personal data, and you consent to such activities.

We engage with various trusted service providers to better support our business. You can ask for a list of these providers by emailing [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com). Currently, these providers include Microsoft, Amazon Web Services, Workday, Slack, and Concur.

For the purposes of European Directive 95/46/EC and applicable national implementing laws in your jurisdiction, we are a data controller with respect to your data. Any personal data we collect is transferred in accordance with our agreements based on the Standard Contractual Clauses set out by the European Union.

If you have any inquiries about how we handle or transfer your personal data, please email [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com).

**Security**

We provide reasonable and appropriate physical, electronic, and procedural safeguards intended to maintain the confidentiality of the personal data we collect. While we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

**Changes**

Any changes to this notice will be posted here, along with the date of the last update.

**Who can you contact to learn more?**

If you have any questions regarding our privacy policy or our use of personal data, please email [privacyofficer@gogoair.com](mailto:privacyofficer@gogoair.com).

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ATTN: Privacy Manager  
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