



GLOBAL EAGLE ENTERTAINMENT EMPLOYEE AND JOB CANDIDATE PRIVACY NOTICE

Effective Date : 25 May 2018

1. SCOPE

Global Eagle Entertainment, Inc. and its affiliates worldwide (collectively, "Global Eagle," "we," "our," or "us") collects and uses the personal data of its employees and job applicants. This Privacy Notice ("Notice") provides current and prospective employees of Global Eagle with information about the types of personal data Global Eagle holds about them, the purposes for which Global Eagle processes that data, the entities with which Global Eagle may share such data, and the steps Global Eagle takes to secure the data.

If you are employed at Global Eagle in the European Union, please note that your employer is the controller with regard to the processing of your personal data as defined in the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR").

Global Eagle collects information from its employees and applicants worldwide in order to provide the employment services necessary to fairly evaluate and compensate its employees, adhere to applicable data protection and employment laws as well as to Global Eagle's internal policies, ensure the quality of its products, and provide a safe workplace. This policy applies to the Global Eagle global organization and is meant to provide a general notice to Global Eagle employees and job applicants on Global Eagle business practices regarding the personal data of Global Eagle employees and job applicants.

PLEASE CONTACT GLOBAL EAGLE'S HEAD OF COMPLIANCE AND PRIVACY WITH ANY QUESTIONS OR CONCERNS AT PRIVACY@GLOBALEAGLE.COM OR DMITRY CHAUSOVSKY, HEAD OF COMPLIANCE AND PRIVACY, GLOBAL EAGLE ENTERTAINMENT, 6100 CENTER DR., SUITE 1050, LOS ANGELES, CA 90045

2. PERSONAL DATA, DEFINED

"Personal Data" shall mean any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal data can identify, or when combined with other information can be used to identify, you, your dependents or beneficiaries (collectively "employee personal data").

3. PERSONAL DATA GLOBAL EAGLE COLLECTS

Global Eagle collects information from job candidates and employees worldwide for the purposes stated below. The information collected on a job candidate or employee can vary based on the requirements and/or limitations of the applicable country as well as the requirements of the job position or salary grade. Following are the general categories and some examples of the personal data that Global Eagle collects and maintains on its employees, and where applicable, job candidates.

Category	Examples of Personal Information
General Employment Information	Name, address, age, date of birth, gender, contact information, marital status, Curriculum Vitae, resumes, previous employment background, education history, professional qualifications, and language and other relevant skills; information on family members such as name and contact details of spouse or partners and/or children.
Work Record Information	Details on performance management ratings, development plan and willingness to relocate, position, title, salary plan, unit/department, location, supervisor(s) and subordinate(s), employee identification number, employment status and type, terms of employment, employment contract, work history including re-hire and termination date(s), length of service, retirement eligibility, performance appraisal, promotions and disciplinary records; working time records (including vacation, sickness leave and other absence records, leave status, hours worked, and department standard hours), and overtime and shift work and termination date.
Remuneration and Benefits	Banking details, base salary, bonus, benefits, salary step within assigned grade, stock options and other awards, currency, pay frequency, effective date of current compensation, salary reviews, and tax ID and fiscal code.
Sensitive and/or High Security Information	Background checks, reference checks, national identification number, identity card data, social security number, citizenship/immigration information (visa, residency or work permit), bank account numbers, drivers' license number.

We may be required by law to collect certain personal information about you for recruitment purposes, or as a consequence of our relationship with you as an employer. Failure to provide this information may prevent or delay the fulfilment of these obligations.

To the extent that you provide us with personal data such as contact information and/or sensitive information such as health data about beneficiaries, domestic partners, family members and emergency contacts, it is your responsibility to inform such individuals of their rights and to obtain their explicit consent, where necessary, to the processing (including transfers) of their personal data (including sensitive data) as set forth in this Notice, as may be necessary and in compliance with applicable local laws.

4. USES OF YOUR PERSONAL INFORMATION

Global Eagle collects and uses the personal information of candidates and employees to manage the employment relationship from recruitment through the end of employment. In general, this is to comply with Global Eagle's obligations to its employees and for the purposes of the legitimate interests of Global Eagle, including managing business operations, staffing assessment and career development, providing benefits and services, and complying with legal obligations.

In particular, Global Eagle processes personal data to fulfil our contractual obligations to you, for example to pay your salary correctly and to provide you with appropriate access to our premises, in connection with the following purposes:

Management

- Employee personal data is used to manage your position with us as an employee including your reporting structure, performance, and personal development, as well as for talent management and succession planning.

- **Payroll and Compensation**
 - We use employee personal data to determine compensation and process payroll, including administering salary, wages, stock options, stock grants, and bonuses.
- **Travel and Expenses**
 - We use employee personal data to provide you with travel required to perform your duties, as well as for other work-related expenses.
- **Benefits**
 - We use employee personal data to provide you with benefits such as medical and life insurance, disability, and other benefits. In some instances, this will also include personal data of your family members.

We will process your personal data to meet our legitimate interests, for example to provide you with services (such as HR services), and to keep our records up to date and accurate. In particular, we will process your personal data on the basis of our legitimate interest in relation to the following purposes:

- **Recruitment**
 - We use job candidate personal data to operate, evaluate, and improve our recruitment system, including to assess a candidate's skills, qualifications, and interests; verify the candidate's information; communicate with the candidate in relation to the application process; and protect us from fraud and other crime.
- **Reporting**
 - Employee personal data will be used for internal reporting purposes, including through the appropriate internal reporting channels implemented to this effect.
- **Technology**
 - We also use employee personal data to provide you with the technology you require to perform your duties, to operate and manage the information technology and communications systems, as well as to safeguard the IT infrastructure, office equipment and other related company assets.
- **Monitoring**
 - We may operate closed circuit television cameras on some of our premises to ensure the security of our offices and our networks as well as the safety of our employees.
 - To the extent permitted by local laws, we will also monitor compliance with our internal policies.
 - This particular type of monitoring refers to certain company resources such as computers, laptops, mobile phones, tablets, and other electronic assets that are considered to be company property. The expected use of such company resources shall be in accordance with Global Eagle policies. We shall therefore reserve the right to monitor our IT network and communication systems through electronic and other IT control measures.

We will process your personal data for the following purposes, provided that you have granted your prior consent. If we ask for your consent in order to process your personal data, you may withdraw your consent at any time by contacting us using the details provided in this Notice.

- **Sensitive Personal Data**
 - We will process sensitive personal data that relates to your health, trade union membership and racial and/or ethnic data subject to your consent, but only to the extent that these are required beyond purposes related to (i) carrying out our obligations and exercising both your and our rights in the fields of employment and social security, or to (ii) preventive or occupational medicine, for the

assessment of the working capacity of the employee, medical diagnosis, or the provision of health or social care or treatment, where the processing for the purposes described by (i) and (ii) shall be performed in compliance with applicable laws as the legal basis.

- **Branding**

- We will use employee personal data to promote the business and interact with our clients, subject to the employee's express consent where necessary. For example, we may use employee photographs on our Career site to promote working with Global Eagle.

Finally, we will process your personal data to meet our legal obligations to you as your employer, for example health and safety obligations while you are on our premises, or to a third party (e.g., tax and social security authorities).

We will therefore process your personal data in order to comply with the local laws and regulations to which we are subject. This includes complying with income tax and national insurance deductions, fulfilling record-keeping and reporting obligations, conducting audits, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, complying with internal policies and procedures, complying with government inspections and other requests from government or other public or regulatory authorities, and responding to compulsory legal process such as subpoenas.

On occasion, Global Eagle may have a business need to use information for a purpose not originally considered at the time of first collection. In these cases, Global Eagle will provide notice of the new use.

5. TRANSFERS TO OTHERS

We only share your personal data in order to manage you as an employee and provide the services as described in this Notice. We will use various third parties to provide many of the services described above, from both outside or within our organization. We provide these companies with access to your personal data in order for them to perform their function. However, we limit their access to the information required for them to perform a specific function and we contractually require that these organizations maintain the confidentiality of your information.

In particular, we will share your personal data with third parties in the following scenarios:

- **Agents/Service providers**

- Your personal data is shared with vendors who process data on behalf of Global Eagle within the scope of the purposes mentioned in this privacy notice. It is Global Eagle's policy to ensure that its vendors and business partners adequately protect the information entrusted to them by Global Eagle.
- The categories of vendors that Global Eagle uses to process job candidate or employee personal data in order to provide services or meet legal and regulatory obligations are:
 - i) Compensation and Benefits. Pension administration, medical benefits, insurance benefits, employee assistance programs, relocation services, payroll administration
 - ii) Government Reporting. Reporting to tax administration and regulatory bodies.
 - iii) Business Administration. Recruiting firms, law firms, consulting firms, background checks agencies.

- **Affiliates and Subsidiaries**

- Global Eagle is a global corporation that consists of multiple organizations. In general, employee personal data is accessible across the organization for all purposes for which Global Eagle is able to use the data.

- **Business Transfer**
 - In the event of a sale, merger or acquisition, we may transfer your personal data to a separate entity. This entity will be responsible for ensuring that your personal data is used only for authorized purposes and by authorized persons in a manner consistent with this notice, and that the security, integrity and privacy of the information is maintained.
- **Government Reporting**
 - In many instances, we are required to share employee personal data with your government for reporting purposes. In the event of any such request we will make sure to limit the personal data to be shared to the fields required by the relevant law.
- **Law Enforcement/Legal Process**
 - Global Eagle may use and/or disclose your personal information if required to do so by law, in the good faith belief that such action is necessary to adhere to applicable laws or to comply with legal process served on Global Eagle.

6. INTERNATIONAL DATA TRANSFERS

As described above, employee personal data will be shared between Global Eagle and its service providers, as well as across the organization. This sharing will mainly involve transfers of employee personal data to the United States, in addition to other countries where Global Eagle has establishments (Argentina, Brazil, Canada, China, France, Germany, India, Iraq, Kenya, Malaysia, Netherlands, New Zealand, Norway, Russia, Singapore, South Africa, Spain, Sweden, United Arab Emirates, and United Kingdom), that may not be recognized as affording an adequate level of data protection by your local data protection authority. To comply with privacy laws in the European Union, Global Eagle has implemented certain safeguards in the form of model contracts containing the Standard Contractual Clauses approved by the European Commission that govern our transfer of your personal data to the United States and other non-adequate third countries.

The conditions of transfer within Global Eagle are defined in an intra-company data transfer agreement which incorporates the Standard Contractual Clauses. You may review these Standard Contractual Clauses at <https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries> Contact Privacy@globaleagle.com if you have specific questions about where your information is stored and/or accessed Accuracy of Your Information

Global Eagle relies on the accuracy and integrity of its employee data in order to comply with its business obligations. Global Eagle expects its employees to inform it of any changes to their personal data such as changes to contact information, address, marital status, or any information affecting benefits or services provided by Global Eagle.

7. RETENTION OF PERSONAL DATA

Global Eagle retains the information we collect about each employee for as long as that employee is a Global Eagle employee, and for a certain period after their employment is terminated. We retain job candidate information for as long as the candidate is under consideration for employment, and may keep job candidate information on file for future consideration.

When determining how long to retain an employee's or job candidate's personal data after the employment relationship (or potential employment relationship) with Global Eagle is terminated, Global Eagle takes into account how long the personal data is strictly required for the purposes described above (in particular, the limitation periods of the country in which individuals are based for the establishment and defence of legal claims) and its legal and regulatory obligations.

8. INFORMATION SECURITY

Global Eagle has adopted a security framework that addresses the administrative, technical and physical safeguards needed to maintain reasonable and appropriate security of personal data. Global Eagle takes appropriate precautions to restrict access to the personal data of its employees to only those who need to know that information. Global Eagle maintains appropriate measures to protect the information from loss, misuse or inadvertent destruction, including by ensuring that all records including electronic records regarding Global Eagle's employees are stored securely.

Facility and physical security procedures are maintained on our sites worldwide managing visitor and non-employee access to our facilities. In many instances, Global Eagle uses security surveillance cameras in parking lots and other areas in office locations to safeguard our employees and the public. Additionally, access to data centers is monitored and only personnel with appropriate authorization are permitted within these areas of the facility. Communications and network security controls have been put in place requiring authentication in order to access Global Eagle's computer systems and networks. Virus protection and firewalls are in place to prohibit unauthorized access to Global Eagle's systems and networks and to alert Global Eagle whenever such access takes place.

9. YOUR RIGHTS

We strive to ensure that information we have about you is accurate and current, however it is your responsibility to ensure the accuracy of the data you provide to us. If you want to review the personal data you have provided to us, or believe that the information we have about you is inaccurate, you should follow the appropriate local processes to access, erase, rectify, or update your information.

In particular, you are entitled to receive confirmation from us acknowledging whether or not we are processing your personal data and, where applicable, to request access to the personal data in addition to certain information regarding the processing thereof (e.g. purposes, categories of the personal data subject to processing and recipients, etc.) (right to access). You are also entitled to rectify/update inaccurate personal data (right to rectification) and to erase your personal data when, among other reasons, they are no longer necessary for the purposes for which they were collected (right to erasure). In specific cases (e.g., if you challenge the accuracy of the personal data, while this is being checked), you can request a restriction on the processing of your personal data, which can only be processed to file or defend claims (right to restriction of processing). Finally, in certain circumstances, you can also request the personal data in a structured, commonly used and machine-readable format, and the right to transmit such data to another controller without hindrance from us where legally permitted for such purposes (right to data portability).

In addition to the aforementioned rights, you are also entitled to object, at any time, for reasons related to your particular situation, to our processing of your personal data based on our legitimate interests or those of a third party, in which case we will cease in processing your personal data unless we are able to continue relying on legitimate reasons to do so.

Moreover, and in connection with those scenarios where you have given your consent to a particular type of processing in relation to your personal data, you may withdraw such consent at any time.

10. QUESTIONS, CONCERNS, OR TO EXERCISE ANY OF THE ABOVE RIGHTS, CONTACT GLOBAL EAGLE

To exercise your rights regarding the processing of your personal data, or if you have any questions or concerns regarding this Notice or the manner in which your personal data is processed, please contact privacy@globaleagle.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the data protection authority of your country of residence.