

# Privacy notice

## 1 Introduction

1.1 We take your privacy seriously. This Privacy Notice sets out details about your privacy rights and how we gather, use and share your personal information – including the personal information we already hold about you now and any further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the services which we provide to you.

1.2 Our Data Protection Lead (DPL) provides help and guidance to make sure we apply good practice standards to protecting your personal information. Our DPL can be reached by email at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero) if you have any questions about how we use your personal information.

1.3 This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We may make updates to this Privacy Notice from time to time, and we recommend that you review the current version of this Privacy Notice whenever possible. If we make any material changes to the manner in which we process and use your personal information, we may contact you to let you know about the change.

1.4 This Privacy Notice is dated 25 May 2018.

## 2 About Us

We are what is known as the 'controller' of the personal information which we gather and use. When we say 'we' or 'us' in this Privacy Notice, we mean Belfast International Airport Limited. We are registered with the Information Commissioner's Office, or ICO, under registration number Z6278078.

## 3 Your Privacy Rights

3.1 You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. To make enquires or for further information about exercising any of your rights in this Privacy Notice, please contact our DPL at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero).

3.2 You can make a complaint to us by emailing [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero) or to the data protection supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk/>.

3.3 You are entitled to exercise any of the following privacy rights:

**Right to object:** You can object to our processing of your personal information. Please contact us as noted below, providing details of your objection.

**Access to your personal information:** You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with and how long we keep it for. You can make a request for access free of charge by contacting us as noted below.

**Right to withdraw consent:** If you have given us your consent to use your personal information to send you marketing emails, you can withdraw your consent at any time by clicking the "unsubscribe" link in any marketing email which you receive or by contacting our DPL at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero).

**Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.

**Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

**Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

**Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

**Make a complaint:** You can make a complaint about how we have used your personal information to us by contacting us as noted below, or to a supervisory authority - for the UK this is the Information Commissioner's Office, at <https://ico.org.uk/>.

Please make all requests to exercise your privacy rights in writing to our DPL at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero). We are required to verify your identity in order to process your request and may ask you to provide valid identification documents to allow us to do this. We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

## 4 What Kinds of Personal Information We Use

4.1 We use a variety of personal information depending on the services and facilities we deliver or provide to you.

4.2 We are governed by regulations from the Civil Aviation Authority and Department for Transport. In order to comply with these regulations, we need to collect and process certain personal data relating to you and your flight. We also operate a CCTV system throughout the airport and its surroundings for security and operational reasons.

4.3 The personal information we may collect and use includes information given when you sign up to receive free Wi-Fi when you are at the airport, when you book car parking or purchase or request services from us, or if you make a complaint or enquiry about our services.

4.4 In delivering our services and providing our facilities, we may collect a variety of technical information, your name and contact details, car registration details and payment information.

4.5 When you are at the airport, we may collect and process the following information about you:

(a) **CCTV:** there are CCTV cameras throughout the airport and surrounding areas which will record images and video footage of your time at the airport. More information about how we use CCTV is set out in paragraphs 5.2 and 6.1 below;

(b) **Queue and Passenger Flow Measurement:** we use technology which collects and processes technical information from Bluetooth and Wi-Fi signals which may be emitted from your device when you are in the airport;

(c) **Wi-Fi:** when you sign up to use our free Wi-Fi services at the airport we will collect your title, full name, email address, and post code;

(d) **Car Parking and Other Services:** when you book car parking or purchase or request other services from the airport (such as purchasing Priority Security or lounge access or signing up for our newsletter), we will collect (depending on the service) your full name, email address, postcode and car registration number;

(e) **Health & safety / incident records:** If you are involved in an incident whilst at the airport, we may capture personal details, incident details and details of any injuries sustained;

(f) **Competitions:** if you enter any of our competitions, we may collect your name and contact details; and

(g) **Complaint / Enquiry:** if you make a complaint or enquiry about the airport, we will collect your name, email address, phone number, postal address, travel details and information about the nature of your complaint or enquiry.

## 5 How We Gather Your Personal Information

5.1 We only use personal information which we have obtained directly for the purposes described in this Notice.

Your personal information is gathered in the following ways:

(a) **Wi-Fi:** when you sign up to receive Wi-Fi services, your information is collected on the login page;

(b) **Car Parking and other Services:** when you book car parking or purchase or request other services from us your information is collected on the booking page. Our car parks also use Automated Number Plate Recognition (ANPR) systems;

(c) **Health & safety / incident reports:** if you are involved in a health & safety incident while at the airport, a member of staff may complete a form about the incident and may collect your information directly from you when completing this form;

(d) **Competitions:** if you enter one of our competitions, your information is collected in the entry form; and

(e) **Complaint / Enquiry:** when you make a complaint or enquiry, your information may be collected by a member of staff or will otherwise be collected via the format you choose to make your complaint or enquiry (post, website, email or telephone).

5.2 We also may obtain some personal information about you when you are at the airport from our CCTV and Queue and Passenger flow technology.

- **CCTV:** we are required by law to implement and maintain an extensive CCTV system throughout the airport, terminal, car parks and surrounding areas. This is primarily for reasons of public safety and for the prevention and detection of crime. Footage is handled in accordance with data protection laws, and in particular is only held for a limited period of time before it is automatically deleted. Please contact the DPL at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero) if you would like to know more about how our CCTV systems operate;
- **Queue and Passenger flow:** technology is used throughout the airport to collect and process Bluetooth and Wi-Fi signals that may be emitted by your device.

## 6 How We Use Your Personal Information

6.1 We will use your personal information for the following purposes:

- to provide you with services which you have requested, ordered or purchased from us or a third party, we will use (depending on the service): your name; title; email address; residential address; postcode; telephone number; car registration; flight number and payment information. We collect this information for the purpose of processing and confirming your car park booking or providing the other services you have purchased or requested (such as Priority Security or lounge access). Our car parks use Automated Number Plate Recognition (ANPR) systems to facilitate easy access and exit;
- we use technical information from Bluetooth and Wi-Fi signals to help us monitor passenger movements throughout the airport and in particular to monitor queue times and manage passenger flows;
- where it is appropriate for us to do so (including for security reasons, to respond to a complaint or query from you) we may use your personal information (such as boarding pass data and CCTV images) to locate where you are or were within the airport;
- we will use your payment information to allow for you to make payment to us where required in advance of the provision of any services which you have ordered or purchased. We will share this information with third party payment processors where required for this purpose;
- where you have registered with us for access to our free Wi-Fi service, we need to use your name, email address and postcode in order to provide you with this service;
- where you have entered a competition promoted by us, we will use your name and contact details to let you know if you have won a prize;
- where you have agreed to receive marketing emails from us, we need to use your name and email address, we may use your postcode and country of residence to ensure that the marketing emails you receive are relevant to your personal circumstances (for example, we often send marketing emails which are relevant only to passengers based in the UK) and we may pass your personal information on to our service providers who help us with these marketing activities;
- to comply with our legal obligations (such as our obligations to maintain an extensive CCTV system for the prevention and detection of crime) we will use any information you

have given us where it is necessary for us to use that information to comply with any such legal obligation;

- in order to comply with health, safety or legal obligations and to ensure the proper operation of the airport we will use the personal and incident details captured as a result of any incident;
- to address your complaints or enquiries, we will use the information you provided when submitting your complaint or enquiry to us.

## 7 Our legal basis for using your personal information

7.1 We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- we have your consent (if consent is needed), for example your consent to send you marketing emails;
- we need to use the information to comply with our legal and regulatory obligations (for example, recording footage of your time at the airport using our CCTV system);
- we need to use the information to perform a contract with you (for example, where you have ordered services from us); and/or
- it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests for appropriate operational reasons, to contact you about products or services, market to you, to collaborate with others to improve our services, or to use non-privacy invasive technologies to be able to better run our airport operations.

7.2 Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time. Please see paragraph 11 below.

7.3 Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations.

We will not collect or use any personal information of this kind under this Privacy Notice.

## 8 Sharing Your Personal Information with Others

8.1 We will share personal information with relevant third parties where:

- you have given us your express consent to do so (see paragraph 8.2 below for more information);
- we need to do so for the purposes of making any services which you have ordered or purchased available to you (for example, where you book car parking services your information is shared with third party providers who help us deliver this service);
- it is necessary to allow us to meet or enforce a legal obligation (for example, we may need to share CCTV footage of you with the police or with the Department of Transport in certain circumstances); or
- where it is fair and reasonable for us to do so in the circumstances.

We will only share your personal information with third parties to the extent needed for the purposes set out in paragraph 6 above.

8.2 We will share your personal information with our partners for marketing purposes where you have given us permission to do so. We will never share your information with a third party for marketing purposes without your express consent.

(a) **Wi-Fi SPARK:** Wi-Fi SPARK Limited is the official sponsor of our Wi-Fi service. When you sign up to the terminal WiFi service, we will ask you whether you would like to opt-in to receive marketing emails from Wi-Fi SPARK. Where you have given us your express consent, we will share your personal details with them to allow them to send you marketing emails. Wi-Fi SPARK's privacy policy is available to view at <https://www.wifispark.com/privacy-policy>

8.3 Who we share your personal information with depends on the services which you have purchased or ordered (for example, car parking and Wi-Fi services).

8.4 We will also share your personal information with our sub-contractors (companies who supply services to us) where it is necessary to do so.

(a) **IT Suppliers:** Information may be stored and processed on systems provided and supported by our third party IT suppliers (such as our Wi-Fi service provider, our provider of IT infrastructure services, the provider of our complaint management system and/or the provider of our health and safety management systems).

(b) **Payment processors:** Information may be processed by payment companies for the purposes of processing any payment which you make to us.

(c) **Car park management:** Information may be stored and processed by our car park booking system for the purposes of facilitating any booking which you have made for car parking.

(d) **Marketing:** we use third party software applications to help us issue marketing communications. Some marketing activities may be outsourced to third party organisations who assist us with our campaigns or communications. Where you consent to receive marketing your information may be shared with them for this purpose.

## 9 Transfers Outside the UK

We may need to transfer your information outside the UK to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area (EEA), such as the USA.

We may need to transfer your personal information to territories that are outside the EEA. We will only transfer your personal information outside the EEA where either:

(a) the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or

(b) we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong

contractual undertakings approved by the relevant regulators such as the EU style model clauses. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

## 10 How Long Do We Keep Your Personal Information For?

We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

(a) Where we have been using your personal information to provide you with marketing emails, we will retain this information for 6 months from the last marketing e-mail you opened or until you opt out. We will delete your personal information following your request to be removed from our marketing email list (opting out) or if you have not opened a marketing e-mail for 6 months.

(b) Where you have ordered or requested a service (such as car parking) from us or a third party, we will retain your personal information for two years from the date you last used the service, unless you used an airport user account to book, in which case we will keep it until you request that your account is deleted.

(c) Where you have made a complaint or enquiry, we may hold your information for up to three years after your complaint or enquiry has been resolved. We retain the personal information submitted when you make a noise complaint or query for up to six years.

(d) We retain information relating to health & safety and other incident reports for up to 5 years.

(e) We may hold your personal information for longer where it is necessary to do so for the management of any active or potential legal proceedings, to resolve or defend claims, and for the purpose of making any necessary remediation payments.

(f) We retain most CCTV footage for a period of 30 days before it is securely destroyed. Where we have saved particular footage related to an incident, legitimate request or claim we retain that footage for as long as is necessary to fulfil the purposes for which it has been retained.

(g) We do not retain information obtained from queue and flow management technologies unless related to an incident, legitimate request or claim, where we retain that data for as long as is necessary to fulfil the purposes for which it has been retained.

## 11 Keeping You Up To Date

11.1 Where you have given us consent to receive marketing, we may use the contact details which you have provided to us to communicate relevant news and information about our services to you by email, post, text message, social media, and notifications on our app or website.

11.2 You can withdraw consent at any time by clicking the "unsubscribe" link in any marketing email which you receive or emailing us at [dataprotectionlead@bfs.aero](mailto:dataprotectionlead@bfs.aero)

## 12 Cookies and Your Online Activities

We use cookies to track your use of our website <http://www.belfastairport.com> and to provide tailored marketing messages when you visit our website. When you first visit our website a

'cookies banner' will appear directing you to this Notice and if you continue to browse without disabling our cookies you are consenting to our use of cookies as described here. Please refer to our cookies policy for further information about the cookies which we use and how details on how to disable them.