

## **ARTICLE 13 PRIVACY NOTICE**

### **Data Protection Act 2018/General Data Protection Regulations UK (GDPR UK)**

**THIS PRIVACY NOTICE COVERS THE SECURITY PASS APPLICATION PROCESS FOR PRIVATE OWNERS/FLYING CLUB**

#### **THE PERSONAL INFORMATION WE COLLECT**

We currently collect and process the following information:-

- Name (Surname, Forenames, Middle names)
- Current Address
- Current Address From
- Personal E-mail & Work E-mail address
- Date of Birth
- Place of Birth
- Nationality
- Passport or Driving License Details
- National Insurance No & Issuing Country
- Personal Tel No & Work Tel No
- Signature
- Criminal Record Check Details
- Counter Terrorism Check Details (if applicable to application)
- General Security Awareness Certificate (if applicable to application)
- Photograph

#### **HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT**

All of the personal information we process is provided to us directly by you for the following reason: -

We use the information that you have given us in order to check your identity and issue your London Biggin Hill Security Pass.

It is a Regulatory requirement and Government Policy in order to meet the requirements of the UK National Security Programme.

Under the General Data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is: -

We have a legal obligation and the processing is necessary for us to comply with the law.

Where we are collecting Special Category Data in this process i.e your photograph, we are processing this data under the specific condition in Article 9 "Obligation of Controller/data subject" and the substantial public interest condition is "Preventing or detecting unlawful acts". Should you require additional information please feel free to contact the [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com).

#### **HOW WE STORE YOUR PERSONAL INFORMATION**

Your hard copy personal information is securely stored on site at London Biggin Hill Airport in locked offices and cabinets with access only to security personnel.

We store some of your information in our Security Pass System which is necessary for the processing and issue of your Security Pass. Our Security Pass System data is stored on our secure airport server.

We store your photograph in our Security Pass System and on our secure airport server.

We keep your personal data for the duration of your security pass. Once your security pass has been handed back to the airport we will hold your data for an additional 6 months. After this time we will dispose of your information by complete deletion from our Security Pass System and then secure destruction of your original paperwork.

Payment for your security pass will be taken via Zettle by paypal (Europe). You can choose to have a receipt sent to you via e-mail when you pay for your security pass. If you choose to provide your e-mail address Zettle will remember your details for the next time you buy something from a merchant who uses Zettle, if you use the same payment card. Zettle will only use your e-mail address to send receipts to you. They will not use your contact details for any other purpose and will not share them with anyone else without obtaining your written consent first or inform you prior to initiating any processing for new purposes. If you wish to opt out from receiving any further receipts when you purchase our product just follow the link in the receipt you have received and opt-out. For your information you can view Zettle by Pay Pal's privacy policy by following this link [www.zettle.com/gb/legal/privacy-policy](http://www.zettle.com/gb/legal/privacy-policy).

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com) or use the information supplied in the 'Contact Us', section below. To process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

#### **THE RIGHT TO BE INFORMED**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

#### **THE RIGHT OF ACCESS**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to exceed one calendar month, where we require additional time or (extended by 2 calendar months), or, in the case of repetitive requests, we reserve the right to request payment (for reasonable administrative costs) before processing the request, we will inform you.'

#### **THE RIGHT TO RECTIFICATION**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

#### **THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

Due to the complex nature of Consent and legal exemption, we are not always able to fulfil deletion ("Right to be Forgotten") requests, and it is essential you understand this before accessing the service.

### **THE RIGHT TO RESTRICT PROCESSING**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of personal data is contested.
- b) Processing of personal data is unlawful.
- c) We no longer need personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised, and processing is restricted pending a decision on the status of the processing.

### **THE RIGHT TO DATA PORTABILITY**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of Consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

### **THE RIGHT TO OBJECT**

You have the right to object to our processing of your data where;

- a) Processing is based on legitimate interest;
- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

### **DATA SECURITY**

We may also be required to share your personal data with employers, our trusted third-party organisations, government agencies and law enforcement authorities. We may need to share your personal data to fulfil our purposes for processing your personal data and/or because those third parties need to process your personal data for their own purposes to safeguard national security and prevent and detect crime. Where we share your personal data with third parties, they will only use it in compliance with data protection legislation. These third parties may transfer your personal data overseas, but we will always ensure the disclosure is legitimate and proportionate for processing.

To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and ensure your information supplied is held securely, in accordance with the Data Protection Act 1998.

### **HOW TO COMPLAIN**

If you have any concerns about our use of your personal information, you can make a complaint to us at London Biggin Hill Airport [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com)  
You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Livechat via [ico.org.uk/livechat](https://ico.org.uk/livechat)

Helpline number: 0303 123 1113

CO website: [www.ico.org.uk](https://www.ico.org.uk)