

## **ARTICLE 13 PRIVACY NOTICE**

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

**THIS CCTV PRIVACY NOTICE IS APPLICABLE FOR ALL VISITORS TO LONDON BIGGIN HILL AIRPORT**

London Biggin Hill Airport is collecting your personal data. When we collect personal data, we are obliged legally to provide you with certain information, it is called the "Right to be Informed". That information is contained in the below Notice. If any of the information we provide to you is not clear, please see contact details for London Biggin Hill's Data Manager further down this Notice, please do not hesitate to make contact and ask for further information.

#### **WHY WE NEED IT – THE PURPOSE OF PROCESSING**

London Biggin Hill Airport has CCTV across its infrastructure, including the terminal. CCTV will capture images in real time in whichever direction the cameras are pointed, and these cameras will capture footage of you whilst you are on the premises. Cameras have been situated both inside and outside the buildings.

We are collecting and processing personal information via the CCTV systems for the following purposes:

- To ensure the health and safety of Airport visitors
- To detect, prevent or reduce the incidence of crime
- To prevent and respond effectively to all forms of possible harassment and disorder
- To reduce the fear of crime
- To create a safer environment
- To provide emergency services assistance
- To provide evidence of regulatory compliance to Department of Transport (DFT) and Civil Aviation Authority (CAA) if required
- \*To monitor the use of IT systems, and their users, throughout the airport for security purposes.
- \*For security compliance & performance monitoring and measuring
- \*To monitor operational standards throughout the airport, including contractual agreements with partners

\*Operational concerns are not normally a reason to operate a CCTV system, they are not necessary or appropriate for something so intrusive. However, the airport is a unique environment. Where an operational issue is highlighted and there may be security concerns, the CCTV system will be used to check those operations, where necessary and appropriate.

#### **WHY WE ARE ALLOWED TO PROCESS YOUR PERSONAL INFORMATION IN THIS WAY – THE LAWFUL BASIS**

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

- Legitimate Interest

#### **WHO WE WILL SHARE YOUR PERSONAL INFORMATION WITH AND WHO HAS ACCESS**

On some occasions following an incident CCTV may need to be shared with our crime partners, as listed below:-

UK Counter Terrorism Unit  
UK Border Force (part of the home office)  
Police/Security Services

Extraction of recorded footage will be tightly controlled by the Airport. Data extraction from the system will only be carried out by authorised persons.

Internal CCTV footage will only be processed by airport staff who are authorised to do so and any other departments where a legitimate and lawful reason for their involvement is required. All access is monitored and recorded.

Powergate Solutions Ltd who are London Biggin Hill's IT Management Contractor may also require access from time to time but this will only be for general maintenance of the system and any IT issues.

## **WHERE YOUR PERSONAL INFORMATION WILL BE STORED OR TRANSFERRED TO**

Images are stored in an electronic format utilising Networked Video Recorders (NVRs) to record and manage CCTV images. These images are automatically deleted after 31 days, unless they are extracted to preserve specific events or information. Once recorded, video cannot be altered, ensuring that the audit trail is intact for evidential purposes. The NVRs will automatically manage the disk space according to the retention policy. The NVRs are located in secure, environmentally controlled rooms, fitted with door controls to restrict physical access to the equipment. Our servers are based within the UK.

## **HOW LONG WE WILL KEEP YOUR PERSONAL INFORMATION FOR**

The CCTV system will keep footage for 31 days, at which point it will be automatically overwritten.

## **YOUR RIGHTS AS A DATA SUBJECT ARE AS BELOW**

### **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 (\*note this is not an absolute right)
- 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.

## **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.

The ICO's address:

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 ICO

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