

ARTICLE 13 PRIVACY NOTICE

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

EMPLOYEE SECURITY PASS APPLICATION PRIVACY NOTICE

THE PERSONAL INFORMATION WE USE

We currently collect and process the following information: -

- Name (Surname, Forenames, Middle names) *
- Title
- Current Address
- Current Address From
- Personal E-mail
- Work E-mail Address*
- Date of Birth*
- Place of Birth*
- Nationality
- Passport*
- Passport Issuing Country*
- Driving License (only applicable if passport cannot be supplied) *
- Driving License issuing Country (only applicable if passport cannot be supplied) *
- National Insurance No
- Personal Tel No
- Work Tel No
- Signature
- Criminal Record Check Certificate
- Counter Terrorism Check (if applicable to application BQH will sponsor and apply on your behalf
- Date Counter Terrorism Check Issued (if applicable to application)
- Copy General Security Awareness Certificate (if applicable to application)
- Photograph
- Pass Start Date
- Pass Expiry Date
- Card Status
- Job Role*

HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT

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

We are collecting your personal data for initial, and continuous background checking in order to supply you with a London Biggin Hill Airport security pass.

We collect and use your personal information to check the eligibility and suitability of applicants to hold an airport pass and to administer the airport pass scheme in accordance with regulatory requirements.

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.

Your counter Terrorism Check (if applicable to your job role) will be sponsored by London Biggin Hill Airport through the National Security Vetting Solution Internet Portal. UKSV is part of the

Cabinet Office and will act as a joint controller of your data from the point of receiving your application.

CTC's are required for certain job roles within the airport and we have a legal obligation to ensure that security clearance is granted as per the Single Consolidated Direction (Aviation) Regulations. In order for us to sponsor your application we will be required to share some items of personal data, where you see a * on the personal data we collect these are the data items we are required to share with NSVS in order to sponsor your CTC clearance. We will apply for your CTC through the National Security Vetting portal.

London Biggin Hill Airport will not see any further details that you enter via this portal. A privacy notice will be available for you to see when you first enter the portal to set-up your account.

London Biggin Hill Airport will receive your clearance certificate via e-mail. Your clearance certificate will include your name, date of birth, the date the clearance was given and the expiry date.

London Biggin Hill Airport will advise you when the clearance has been granted.

HOW WE STORE AND RETAIN 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 administration. Your hard copy data will be kept for the duration of your pass by the security department and then upon leaving the company your hard copy data will be passed to Human Resources who will keep this data for your employment plus 6 years in locked offices and cabinets with access only to the HR department.

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 UK airport server. Data is stored for the length of your security pass plus one year and then deleted.

We store your photograph in our Security Pass System and on our secure airport server. Your photograph will be stored for the length of your security pass plus 1 year and then deleted from both systems.

Your Counter Terrorism Check (if applicable), Criminal Record Check and passport or driving license will be scanned and a PDF will be loaded into our Human Resources Management System People HR. You will have access to your data held on People HR. Data is stored in a data centre in the UK. When an employee is processed as a leaver data is archived in the system and can only be accessed by the Human Resources department. Archived data is retained for employment plus 6 years.

Your Counter Terrorism Check (if applicable) and Criminal Record Check (dates only) will be stored in Centrik. Centrik is an operational management software solution operated and supported by Total AOC Solutions. Training records and mandatory requirements are stored here to ensure that regulatory requirements are kept up to date. Centrik is hosted by Rackspace on dedicated servers across two UK based data centres.

Your General Security Awareness Certificate PDF will also be up-loaded onto the Centrik software.

Should your contract cease with London Biggin Hill Airport personal data will remain within the Centrik system for 1 year. After 1 year personal data will be redacted but any content will remain. Content will remain for 5 years in line with CAA requirements.

DATA SHARING & ACCESS TO YOUR DATA

Any applicant applying for an airside pass will be required to hold a valid Accreditation Check (AC) before an airside pass can be issued or renewed. The AC forms part of the UK National Security Vetting framework and will have a lifespan of 5 years. London Biggin Hill Airport will apply for your AC on your behalf and will share your name, date of birth, NI number, personal e-mail address, personal landline or mobile number, current address. Your data will be shared with the Home Office on a regular basis in order to enable repeat checks in support of the 'enhanced background check' process as mandated under the Direction to Aerodrome Managers served by the Secretary of State for Transport under section 14(1a) of the Aviation Security Act 1982. This will happen for the period in which you hold the ID pass plus 1 year. For your information the Home Office will be an independent controller of the data for the home offices own purposes.

The Home Office is a government department headed by a Minister of the Crown and has common law powers to share data with applicable law enforcement authorities, CAA, other parts of the HO, DFT and the Cabinet Office, for the prevention of crime.

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.

People HR are prohibited to manage any data within the system but on occasions may seek approval from London Biggin Hill Airport to enter records in order to deal with technical issues within the system should they occur.

Once you have received your pass, we will also have access to the information collected by the door access system, each time you use your pass to gain entry to different areas of the airport. Levels of access will be given depending on operational need. Should there be a concern with regards to security, crime or health and safety we may be required to check this data.

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 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 for this particular processing activity are: -

- Right of Access
- Right to Rectification
- Right to Restriction of Processing
- Right not to be subject to a decision solely based on automated processing

Updates to this privacy notice will be available on www.bigginhillairport.com under data protection.

Please see below a full list of data subject rights below but please remember that depending on the legal basis for processing they may not be absolute rights. If you require further information, please do not hesitate to contact us.

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

THE RIGHT IN RELATION TO AUTOMATED DECISION MAKING & PROFILING

As a data subject you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly affects you.

DATA SECURITY

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

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

01959 578517

London Biggin Hill Airport

Main Passenger Terminal

Hangar 2

Biggin Hill

Bromley

TN16 3BH

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

Live chat via [ico.org.uk/live chat](https://ico.org.uk/live-chat)

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk