

ARTICLE 13 PRIVACY NOTICE

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

CENTRIK - OPERATIONAL SOFTWARE PRIVACY NOTICE FOR EMPLOYEES, VISITORS & TENANT COMPANIES

London Biggin Hill Airport are committed to ensuring that your privacy is protected. This privacy notice explains how we use your personal data.

London Biggin Hill Airport use an operational management software called Centrik to manage, organise and comply with training and health and safety requirements. This cloud-based software is provided by Trustflight.

London Biggin Hill Airport will act as a controller of your data whilst Trustflight is considered a data processor.

We use this software to manage the airport business so that we operate an effective safety and compliance management system and so that we can keep training records as required by regulation.

THE PERSONAL DATA WE COLLECT & USE, WHY WE USE IT AND THE RETENTION PERIODS SET

Type of personal data we collect	Why we collect this information	The lawful basis for collecting and using this data	Retention
Name, Department Details of accident/incident/near miss	To record accidents/incidents and near misses on the airport	Legal Obligation Health & Safety at Work Act 1974 Civil Aviation Authority Regulation UK(EU)376/2014 Reporting of injuries, Diseases & Dangerous Occurrences (RIDDOR 2013)	5 years – legal obligation
Name, Department	To inform the Civil Aviation Authority of reports under the mandatory occurrence reporting scheme	Legal Obligation Civil Aviation Authority Regulation UK(EU) 376/2014 UK.ADR.OR.D.005 UK.ADR.OR.D.020 UK.ADR.OR.D.035	5 years – legal obligation
Name, Department, Address, Contact Number	In accordance with Reporting of injuries, Diseases & Dangerous Occurrences (RIDDOR 2013)	Legal Obligation Reporting of injuries, Diseases	5 years – legal obligation

		& Dangerous Occurrences (RIDDOR 2013) Civil Aviation Authority Regulation UK(EU)376/2014 UK.ADR.OR.D.005 UK.ADR.OR.D.020 UK.ADR.OR.D.035	
Name, Department, e-mail, telephone number, organisation,	Processing of investigations/reports	Legal Obligation Reporting of injuries, Diseases & Dangerous Occurrences (RIDDOR 2013) Health & Safety at Work Act 1974 Civil Aviation Authority Regulation UK(EU)376/2014 UK(EU)365/2014	5 years – legal obligation
Name	Action Management	Legal Obligation Civil Aviation Authority Regulation UK.ADR.OR.D.005 UK.ADR.OR.D.020 UK.ADR.OR.D.035	5 years – legal obligation
Name, Department	Organisational Audits & finding management	Legal Obligation Health & Safety at Work Act 1974 Civil Aviation Authority Regulation UK.ADR.AR.B.005	5 years – legal obligation
Name, E-mail, Organisation, Department	Safety meeting agenda and meeting records	Legal Obligation Health & Safety at Work Act 1974 Civil Aviation Authority Regulation UK.ADR.OR.D.005	5 years – legal obligation

Name, E-mail Address, Contact Numbers, Organisation, Department, Signature	Airport Manuals	Legal Obligation Health & Safety at Work Act 1974 Air Navigation Order 2016 Licensing of Aerodromes - CAP 168	5 years – legal obligation
Name, E-mail, Signature, Organisation, Department	Airport Operating Instructions/Procedures/Notices/Documents	Legal Obligation Health & Safety at Work Act 1974 Air Navigation Order 2016 Licensing of Aerodromes - CAP 168	5 years – legal obligation
Organisation, Department	Departmental Procedures/Notices/Documents	Legal Obligation Health & Safety at Work Act 1974 Air Navigation Order 2016	5 years – legal obligation
Name, Organisation, Department, Signatures	Record of training	Legal Obligation Health & Safety at Work Act 1974 Air Aviation Order 2016 Licensing of Aerodromes - CAP 168 Civil Aviation Authority Regulation UK.ADR.OR.B.005 UK.ADR.OR.B.055 UK.ADR.OR.B.017 Department for Transport – airside pass regulation	5 years – legal obligation

Name	Risk assessments	Health & Safety at Work Act 1974 Licensing of Aerodromes - CAP 168 Air Navigation Order 2016	5 years – legal obligation
Name	To allow for inspections of equipment across the site	Legal obligation PUWER 1998 Health & Safety at Work Act 1974 Licensing of Aerodromes - CAP 168 Air Navigation Order 2016	5 years – legal obligation

WAY IN WHICH YOUR DATA IS COLLECTED

Directly from you in person

Via your HOD/Manager/Colleague

Via your based operator, tenant or contractor applying for works at London Biggin Hill Airport.

HOW YOUR PERSONAL DATA WILL BE STORED

Data is entered, updated, deleted and otherwise managed directly by London Biggin Hill Airport.

Data is stored within Centrik in segregated databases on hardware located in security data centres. These data centres are located in the UK one in Slough, Berkshire and one in Crawley in West Sussex.

Any files that we upload are encrypted and data is backed up daily.

Centrik use firewalls to protect from malicious access attempts and hacking attacks.

WHO WILL HAVE ACCESS TO YOUR DATA

Centrik allows London Biggin Hill Airport to limit access to data by allowing us to allocate fine-grained access rights to each user. London Biggin Hill Airport controls access to all users, including Trustflight (Centrik) staff. Access will only be given where required.

Data subjects have access to their own particular training records.

WHO WE SHARE YOUR DATA WITH

Centrik do not share or make use of any data stored in Centrik other than as necessary for them to provide services to London Biggin Hill Airport, such as providing Centrik itself, supporting users or helping London Biggin Hill Airport with Data Subject Access Requests.

Reporting of injuries, Diseases & Dangerous Occurrences (RIDDOR 2013) requires us to report if someone has died or has been injured because of a work-related accident. We will share your name, department, address & contact number and details of the injury/disease or dangerous occurrence when required by law. More details on reportable occurrences can be viewed here [Reportable incidents - RIDDOR - HSE](#)

London Biggin Hill Airport may require to share specific personal information, should this be requested and required as part of a legal claim, which includes;

- Local Authorities
- Solicitors (3rd party acting for an injured party)
- Police/Emergency Services
- Insurance Companies

We will only share adequate, relevant and necessary data for the purpose for which it is being processed.

YOUR DATA SUBJECT RIGHTS

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.

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 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.
- e) Processing involves automated decision-making and profiling.

THE RIGHT NOT TO BE SUBJECT TO AUTOMATED DECISION MAKING

The right not to be subject to automated decision-making (making a decision solely by automated means without any human involvement or profiling (automated processing of personal data to evaluate certain things about an individual)). Profiling can be part of an automated decision-making process.

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 information supplied is held securely, in accordance with the Data Protection Act 2018 and the UK GDPR.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at:-

datamanager@bigginhillairport.com.

01959 578517

London Biggin Hill Airport

Biggin Hill

Bromley

TN16 3BH

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

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk