

The Glasgow Airport Privacy Notice

We are Glasgow Airport Limited (known as Glasgow Airport). Here's how we use and protect your data whilst respecting your privacy.

Our role in your privacy

If you are a customer of Glasgow Airport, subscriber, or just visiting our website, this notice applies to you.

Our responsibilities

Your personal data will be collected by Glasgow Airport who will act as the "Data Controller". A data controller determines the purposes and means of processing personal data. We are registered as a data controller at the UK Information Commissioner's Office (ICO) under registration number Z1077461.

Importantly, within the airport environment, other organisations may collect your personal information, for example: shops, restaurants, telecommunication providers. The personal data collected by these organisations will not be covered by this privacy notice and therefore your personal data privacy in this instance will be the responsibilities of these outlets.

Your responsibilities

- Read this privacy notice
- If you are a customer, please also check your contracts between us: they may contain further details on how we collect and use your data.
- If you provide us with personal information about other people, or if others give us your information, we will only use that for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this privacy notice.
- This privacy notice does not cover the links within this site linking to other websites. You should read the privacy notices on the other websites you visit.

The types data we collect

Contact details

Your name, address, telephone number, email address.

Financial information

Your bank account number, sort code, credit/debit card details.

Travel information

National Identity (passport numbers), flight numbers, products booked through our website, details of minors in your custody, travel schedule.

Image and voice

Call recording is underway on all calls to the airport. CCTV is in operation in and around the airport.

Data that identifies you

Your IP address, login information, online identifiers, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.

Data on how you use Glasgow Airport website

Your URL clickstreams (the path you take through our website), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages and other actions.

What about sensitive data

“Sensitive data” is data about race, ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, data about your sexual life, sexual orientation, and offences or alleged offences.

In some circumstances we collect sensitive data about:

- Race;
- Ethnicity;
- Medical information; and
- Biometrics (where used for ID purposes e.g. eGates at passport control)

How and why we use your data

Data protection laws mean that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

Keeping Glasgow Airport Secure

Boarding card information will be collected for the purpose of access to air-side facilities, voice recording is underway on telephone calls to airport information lines to protect members of staff from malicious or abusive content and baggage will be scanned and images processed for security purposes.

Legal basis for this data usage: contract legitimate interests legal obligation

CCTV

When you pass through Glasgow Airport we will collect static or moving imagery via our CCTV system. Glasgow Airport collects imagery via CCTV cameras located throughout the airport, in both landside (public) and airside (restricted access) locations and on some of our shuttle buses between terminals.

Glasgow Airport may use CCTV imagery for a number of purposes including but not limited to the following:

- To maintain the safety and security of the airport for our passengers, colleagues and stakeholders, including but not limited to control authorities, national security, detection and prevention of crime and aviation security.
- To monitor flows and demand throughout the airport to optimise resourcing and passenger experience.
- To support the effective management of the airport operation and any incidents. For investigative purposes or as evidence to support any formal follow-up to airport incidents.
- To provide evidence of regulatory compliance to Department for Transport (DfT) and Civil Aviation Authority (CAA) and;
- In response to a subject access request.

Legal basis for this data usage: legal obligation legitimate interests

Fulfilling our contracts with you

Managing your purchases of Glasgow Airports products or services e.g. car parking. Purchases of third party services e.g. flights and Wi-Fi.

Legal basis for this data usage: contract

Improving our website

Gathering visitor data to our website including profiling.

Legal basis for this data usage: legitimate interests

Customer services

To enable our customers to make enquiries, requests for information, reports or submit a complaint.

Legal basis for this data usage: legitimate interests

Marketing purposes (with your consent)

Sending you emails and messages about airport destinations, holidays, products and services and our partners.
Asking our customers to take part in research and surveys.

Legal basis for this data usage: consent

Publicity

For publicity purposes where images are taken in places where there is no expectation of privacy e.g. public foyer or retail spaces.

Legal basis for this data usage: legitimate interests

Here is what each of the “legal bases” mean:

Consent

You have given clear consent for us to process your data for a specific purpose. **You can change your mind!** If you have previously given consent to us to process your data you can freely withdraw your consent at any time. You can do this by emailing us at DPO@glasgowairport.com.

If you do withdraw your consent, and if we do not have another legal basis to process your data, then we will stop processing your personal data. If we do have another legal basis for processing your data, then we may continue to do so subject to your legal rights.

Contract

Processing your data is necessary for a contract that you have with us.

Legal Obligation

We need to process your personal data to comply with a common law or statutory obligation.

Legitimate Interests

Processing your data is necessary for our legitimate interests or those of a third party, provided those interests are not outweighed by your rights and interests. These legitimate interests are:

- Delivering, developing and improving Glasgow Airport and its products/services.
- Providing a safe and secure airport for our customers, visitors and staff.
- Determining whether our marketing campaigns are effective.

Your privacy choices and data subject rights

Your choices

You can choose not to provide us with personal data

If you choose to do this, you can come into the airport however you will not be able to pass airside. You can also use the website however will not be able to purchase any products or services without providing personal data.

You can turn off cookies in your browser by changing your settings

You can block cookies by using a setting on your browser to refuse cookies. You can also delete your cookies through your browser settings. If you refuse cookies or turn cookies off you will still be able to visit our website however some pages may not work effectively.

You don't have to be included in our marketing

We will always ask you before collecting your data for marketing. This is your choice and we never pre tick our boxes. If you have previously opted in to marketing you can either unsubscribe at the bottom of any of our emails or you can contact us at DPO@glasgowairport.com. If you opt out of marketing then you will not receive any related news, updates, offers or notices of events.

Your rights

Glasgow Airport will respect all of your data subject rights. You can exercise any of your rights by contacting our group data protection officer at DPO@glasgowairport.com. If we do hold information we will:

- Authenticate you as the data subject
- Determine if a right can be administered
- Complete your request within 30 days
- Communicate to you in clear and intelligible language

You have the right to informed

You have the right to know how we manage your data and that is why we have made this great privacy notice! We have to tell you:

- The categories of data we process
- Why and how we use your data
- Who (if any) third parties we share your data with
- How long we hold your data
- Your rights regarding your data (which we have explained below)

You have a right to access to any personal data we hold about you

You can ask at any time, for a copy of your personal data. Glasgow Airport will respond within one month to advise you if we hold your personal data and if so, we will provide you with a copy of the data unless it would adversely affect the rights of another person e.g. if providing it to you, broke another person's confidentiality.

You have a right to have any inaccurate data rectified

This right allows you to submit changes to your records and once changes are verified, they will be amended on Glasgow Airport records. Similarly, Glasgow Airport will periodically request you to check your data is held accurately.

You have a right to be forgotten

You can request that delete all of your personal data. If you do this, and there is no other lawful basis to keep your data, then it will be removed.

You have the right in some circumstances to restrict our use of your data

You have the right to ask us to restrict how we process your data in some circumstances. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future. This is not an absolute right.

You have the right in some circumstances to object to us using your data

You have the right in some circumstances to object to how we use your data. This is not an absolute right.

Rights related to automated decision making including profiling

Glasgow Airport do not perform automated decision making. We may from time to time perform online profiling however this does not produce any decisions of legal effects.

You have the right to lodge a complaint about how we use your data

If you have concerns regarding how we use your data, please contact our Data Protection Officer in the first instance: DPO@glasgowairport.com.

If you are still unhappy regarding how we have dealt with your complaint, you have the right to contact the UK Information Commissioner's Office (ICO). You can do this by calling their helpline, contacting them through their website or writing to them. Their details are as follows:

ICO telephone helpline: 0303 123 1113

ICO website: <https://ico.org.uk/concerns>

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Information security

We have physical and electronic procedures to secure the personal data we use and collect. All of our staff are trained in data protection.

- **Transmission:** where personal data is electronically transmitted from one computing device to another over a public network an encrypted path will be used e.g. SSL. If your data is transmitted in a hard-copy format from one place to another a secure or locked method of transport will be used, suitable to the nature of the personal data.
- **Storage:** personal electronic records are located on servers in secure premises. If your data is required to be stored outside of the secure premises, the data will be in an encrypted format. Personal paper-based records will be stored in a locked filing cabinet in secure offices to prevent inadvertent access by unauthorised 3rd parties.
- **Access:** only personnel authorised by Glasgow Airport will have access to your personal data records on a need to know basis.
- **Disclosure of personal data:** we do not disclose personal data unless we're required to do so to comply with the law, under contract, have your consent, or if it is in your vital interest.

Transfer to international countries

Your data may be transferred internationally. If your data is transferred, Glasgow Airport will legally safeguard your personal data by:

- Transferring to the EEA countries (Members of the European Economic Area);
- Transferring to an EU adequate country, which are defined as countries outside the EU that offer adequate levels of data protection; and
- Transferring under "EU Model Clauses" agreement with the importing party. These are standardised contractual clauses that make specific guarantees around the transfer of personal data from EEA countries to the rest of the world.

Owing to the global nature of the internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding the protection of your personal data. Where this is the case, end-to-end encryption will be employed to transmit the data securely e.g. using industry standard data encryption (SSL or TLS) to connect to websites or using email encryption technologies.

Where Glasgow Airport is unable to utilise legal safeguards when transferring data to a third-country, Glasgow Airport will seek consent from you to facilitate the data transfer. This could be the case when arranging hotels and car-rentals abroad.

How long do we store your personal data

Subject to all applicable law, all personal data collected under contract will be held for 7 years. Data collected under legitimate interest will be held for a period of 3 years from your last interaction with the business, otherwise it will be removed if no other lawful method of holding your data exists.

CCTV 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. CCTV footage may be held for longer if we have a legitimate reason to do so e.g. incident investigation.

Data collected under consent will be used until consent is withdrawn or if it is no longer useful for the purpose for which it was collected. Some data may not be removed if it involves a disproportionate effort e.g. a website image of you is held by the Google search engine. This does not affect your rights as a data subject.

Please note: after this retention period has expired, Glasgow Airport will be unable to reinstate the original data, offer confirmation of passage through the airport or validate a product or service you may have received, assuming the data was held in the first instance.

Sharing personal data

Glasgow Airport will share your personal data with other organisations in order to supply products or services to you. This could include, but is not limited to, car parking, car rentals, hotels, travel companies and Wi-Fi providers.

We may also share your data in the following circumstances:

- You have given us your express consent to do so
- 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 have ordered goods via Shop and Collect, your information is shared with our Shop and Collect service provider, and when 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.

If Glasgow Airport shares your data on a regular basis it will perform due-diligence and hold written contracts and agreement with these organisations to legally safeguard your data.

If you have consented for us to share your data with other organisations for the purposes of direct marketing, we will keep your consent on record until it is withdrawn or the purpose of holding your data is no longer valid. On deletion of your data, Glasgow Airport will endeavour to contact you to confirm that your information has been removed.

We also use third parties to help us host our applications and platforms to help us to communicate with customers etc. We only use third parties who are compliant with data protections laws.

Cookies

What are cookies?

Cookies are small text files which are stored on your computer when you visit certain web pages. At Glasgow Airport, we use cookies to understand how our sites are used which helps us to improve your overall online experience. Some of the cookies we use are necessary for some of our sites to work whilst other cookies are used to provide tailored advertising by trusted third parties. The cookies we and our third parties place on your computer do not collect personally identifiable information like your name, address or payment details. To find out more about cookies, visit www.aboutcookies.org.

The privacy of your information is important to us and we want to keep you well informed about cookies. We shall continue to work on initiatives in relation to recent cookie legislation to ensure you have the best experience when visiting our website.

Managing cookies

If you would prefer to restrict, block or delete cookies from Glasgow Airport and our third party advertisers, or any other website, you can use your browser to do this. Each browser is different so check the 'Help' menu of your particular browser to learn how to change your cookie preferences. If you choose to disable all cookies we cannot guarantee the performance of our websites and some features may not work as expected.

The different types of cookies we use

Glasgow Airport use the following categories of cookies on our websites:

Strictly necessary

These cookies are essential for certain features of our websites to work e.g. when you make payments for car parking. These cookies do not record identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services you have asked for cannot be provided.

Performance

These cookies are used to collect anonymous information about how you use our websites. This information is used to help us improve our websites and understand how effective our adverts are. In some cases we use trusted third parties to collect this information for us but they only use the information for the purposes explained. By using our websites, you agree that we can place these types of cookies on your device.

Functionality

These cookies are used to provide services or remember settings to enhance your visit e.g. text size or other preferences. The information these cookies collect is anonymous and does not enable us to track your browsing activity on other websites. By using our websites, you agree that we can place these types of cookies on your device.

Targeting and advertising

These cookies are used by trusted third parties to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. Information contained in these cookies is anonymous and does not contain your personal information. To find out more about cookies used for targeting and advertising go to www.youronlinechoices.com and www.networkadvertising.org or contact us on our feedback page for further information about the trusted third parties we use.

Changes to this privacy notice

We keep our privacy notice under regular review and we will place any updates on this webpage. At the start of this privacy notice we will tell you when it was last updated.

Complaints and queries

Glasgow Airport tries to meet the highest standards when collecting and using personal information. For this reason we take any complaints we receive about this seriously. We encourage people to bring it to our attention if they think our collection or use of personal information is unfair, misleading or inappropriate. Please contact the Group Data Protection Officer:

AGS Data Protection Officer
Glasgow Airport,
Erskine Court,
St. Andrew's Drive,
Paisley,
PA3 2SW

DPO@glasgowairport.com

Please reference the AGS airport concerned (Aberdeen, Glasgow, or Southampton) in your correspondence.