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## Privacy Policy

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Effective 5 January 2026

### **1. Introduction**

- 1.1 We understand and respect the importance of guarding your privacy and are committed to protecting your personal information.
- 1.2 This privacy notice covers the way we handle your personal information, what your rights are, and our contact details if you need some additional information or wish to make a complaint.
- 1.3 When we refer to “LBA”, “we”, “us” and “our”, we mean Leeds Bradford Airport Limited (registered number 02065958), whose registered office is at Leeds Bradford Airport, Leeds, LS19 7TU.
- 1.4 We are the controller of the personal data we collect about you, which means we are responsible for deciding how it is collected, stored and used.

### **2. What is Personal Data?**

- 2.1 Personal data is information that relates to an individual. What identifies an individual could be as simple as a name or an identity number or could include other identifiers such as an IP address or a cookie identifier. Information must relate to an individual for it to be classified as personal data. It does not include data which cannot be connected to you (such as anonymous data).
- 2.2 You can find out more on the Information Commissioner’s (**ICO**) website.

### **3. What is Privacy?**

- 3.1 UK data protection law sets out key principles that must be upheld in relation to privacy, as follows:
  - (a) Lawfulness, fairness, and transparency
  - (b) Purpose limitation
  - (c) Data minimisation
  - (d) Accuracy
  - (e) Storage limitation
  - (f) Integrity and confidentiality (security)
  - (g) Accountability
- 3.2 You can find out more about these principles on the ICO’s website.

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### 4. Data Protection Officer

- 4.1 Our data protection officer is available for you to contact if you have any questions, concerns or complaints about our data policies or practices. You can contact our Data Protection Officer by email at: [dataprotection@lba.co.uk](mailto:dataprotection@lba.co.uk)

### 5. Information Commissioner's Office

- 5.1 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  
Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

### 6. Your rights

- 6.1 The law gives you rights relating to the personal data that we process in relation to you. These are:
- (a) **Access to your personal data** – you have the right to a copy of any personal data we hold in relation to you, as well as information about how we process that personal data (which is already set out in this notice). This is known as a “Subject Access Request” and all Subject Access Requests should be made in writing and sent to the email shown above. To make a Subject Access Request for CCTV footage, complete this [form](#).
  - (b) **Rectification of your personal data** – you have the right to have any inaccurate personal data about you corrected. You also have the right to have any incomplete personal data completed.
  - (c) **Right to erasure / “right to be forgotten”** – in certain circumstances, you have the right for personal data about you to be erased. We are not required to erase your personal data if we need to keep it in order to comply with legal obligations or to establish, exercise or defend legal claims.
  - (d) **Right to restrict processing** – in certain circumstances, you have the right to restrict how we process your personal data. There are some purposes for which we can continue to process your personal data even if you ask for it to be restricted. These include storage; the establishment, exercise or defence of legal claims; or for the protection of the rights of another legal or natural person (which includes companies).

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- (e) **Right to object** – if we process your personal data on the basis of our legitimate interests, you can object to that processing. If you object, we may have to stop processing that personal data (and this may mean we are no longer able to interact with you in ways that rely on that personal data). However, we are not required to stop processing your personal data where our legitimate grounds for processing it override your interests, rights or freedoms, or are necessary to establish, exercise or defend legal claims.
- (f) **Right to data portability** – if we process your personal data on the basis of a contract you have with us as an individual, and that data is automatically processed, you have the right to receive that personal data from us in a commonly-used and machine-readable format so that you can transmit it to another data controller (or you can ask us to transmit it for you where technically feasible).
- (g) **Right to lodge a complaint** – You have the right to lodge a complaint with our Data Protection Officer and / or the ICO if you feel that our processing of your personal information infringes on your legal rights. We advise that you contact our Data Protection Officer initially to try and resolve your complaint before escalating your complaint to the supervisory authority.
- (h) **Right to withdraw consent** – If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. Your withdrawal of consent shall not affect the lawfulness of processing of your data before the withdrawal.

6.2 If you wish to exercise any of these rights (or make a complaint regarding data protection), you can contact our Data Protection Officer by email at: [dataprotection@lba.co.uk](mailto:dataprotection@lba.co.uk).

6.3 In the majority of cases, we will respond to your request as soon as possible and in any event within one month of receiving the necessary information required to deal with your request.

6.4 We may ask you to supply appropriate evidence of your identity. For this purpose, we will usually accept a photocopy of your passport plus an original of a utility bill showing your current address.

6.5 There may be some exemptions to dealing with your rights as specified in data protection law, but we will ensure you are fully informed of this as soon as possible and in any event within one month of receiving your request.

6.6 Full information on your rights under data protection law can be found on the ICO's website.

## 7. How we use your personal information

7.1 How we use your personal information varies according to the nature of our relationship (for example, whether you are a customer, an employee or someone we do business with).

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- 7.2 As there is a wide range of activities, we've divided this privacy information into a number of different sections, reflecting the different ways you might interact with us, in order to help you get to the information you want quickly.
- 7.3 Appendix 1 sets out in relation to each activity where we collect personal information:
- (a) What we collect;
  - (b) When we collect it;
  - (c) Why we collect it; and
  - (d) Our lawful basis for using it.
- 7.4 We collect personal information in relation to:
- (a) [Accident, Security, Environmental and Safety Incident Records; Occupational Health Screening Records; Personalised Risk Assessments](#) - if you are involved in a security or safety incident, or accident, at the airport which relates to:
    - (i) personal injury;
    - (ii) breach of any health and safety requirements;
    - (iii) breach of any security requirements;
    - (iv) loss, damage or theft of property; or
    - (v) breach of any laws (including the airport byelaws).
  - (b) [Automatic Number Plate Recognition \(ANPR\)](#) - if you use our car parks.
  - (c) **Bookings**
    - (i) purchasing [car parking](#) at the airport online using our websites or the website of one of our sales agents,.
    - (ii) purchasing [Fast Track Security](#) online using our websites or the website of one of our sales agents.
    - (iii) purchasing access to one of our [lounges](#) using our websites, the website of one of our sales agents, or at the front desk to the lounges.
  - (d) [Business partners](#) - if you work for an organisation other than LBA and are a stakeholder in the operation of the airport (such as representatives of the police, fire service, concessionaires, airlines, business partners, contractors etc).
  - (e) [Candidates and employees](#) - if you apply for a job vacancy with us.
  - (f) [Competitions and Prize Draws](#) - if you enter a competition or prize draw.
  - (g) [Complaints, Correspondence, Pre-Organised Tours and Meetings](#) - if you contact us.

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- (h) [CCTV](#) - if you visit the airport and supplements our CCTV Policy.
- (i) [Entry Data](#) - if you visit any secure area of the airport.
- (j) [Events, Meetings and Training](#) - if you arrange to attend any events, meetings or training at the airport run by us.
- (k) [ID cards](#) - if you apply for or are provided with an ID card by us.
- (l) [Marketing](#) - if you sign up to our marketing list.
- (m) [Security](#) - if you access our security lanes at the airport.
- (n) [Website](#) - if you access or use our websites.
- (o) [WiFi](#) - if you register to use our WiFi.

### **8. Disclosing your information to third parties**

8.1 We will never sell or share your information with other organisations for their direct marketing purposes without your explicit consent.

8.2 We may disclose your information to any of our insurers, professional advisers, agents, suppliers or subcontractors insofar as is reasonably necessary for the purposes set out in this privacy notice. We may share your information with third parties to perform services on your behalf and to help promote our business. Types of third parties who may have access to your information include:

- (a) Suppliers and subcontractors from whom we acquire products and services in order to provide to you the products and services that we are providing to you.
- (b) Vehicle Control Services Ltd, who manage our car parks.
- (c) IDGateway Limited for the purpose of administering our identification pass application system.
- (d) Law enforcement agencies for the purposes of their investigations.
- (e) Our regulators for the purpose of demonstrating compliance with our legal obligations.
- (f) Business process outsourcing providers who provide specific services into our business, including third party IT system suppliers who may host your information on their systems and may need some level of access to resolve technical concerns and potentially other business support areas.
- (g) Organisations who support us in serving you advertisements and content online about our services that we think you might be interested in.
- (h) Business partners to investigate or deal with a complaint or incident.

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- (i) Any business that may buy our company or integrate our company into their business. In this situation, your details may be disclosed to our advisers and any prospective purchasers and their advisers and may be passed on to the new owners of the business.

### 8.3 We may also disclose your information:

- (a) To the extent that we are required to do by law or our regulators.
- (b) In connection with any ongoing or prospective legal proceedings.
- (c) In order to establish, exercise or defend our legal rights (including providing information to others for the purpose of fraud prevention and reducing credit risk).
- (d) In connection with any investigation into a complaint or incident.
- (e) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that information where, in our reasonable opinion, such an authority would be reasonably likely to order disclosure of that information.

## 9. Transferring information outside the UK

9.1 We may transfer information that we collect from you to third party data processors or service providers located in countries that are outside of the UK in connection with the purposes for which we have collected it from you. If we transfer your information outside the UK we will only do so where one of the following applies:

- (a) There is an adequacy decision by the ICO which means that the recipient country is deemed to provide adequate protection for such personal data.
- (b) Where the transfer of information is to a member of our group of companies, and we have in place binding corporate rules with such member which safeguard the information.
- (c) Where we have in place standard model contractual clauses (which include certain safeguards to protection information) with the recipient which have been approved by the ICO.
- (d) If such transfer is needed to enable us to perform our contractual obligations to you relating to products or services we have agreed to provide to you.

## 10. How long we keep your information for

10.1 Information that we process for any purpose will not be kept for longer than is necessary for that purpose. Different purposes will have different retention periods. We will retain your information:

- (a) To the extent that we are required to do so by law.

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- (b) If we believe that the information may be relevant to any ongoing or prospective legal proceedings.
- (c) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
- (d) To support our ongoing business purposes (with due consideration for the rights and freedoms of individuals' privacy).

10.2 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10.3 If you would like further details of how your information is retained by us, please contact us directly using the contact details above.

### **11. Security of your information**

11.1 We are committed to taking all reasonable steps to protect your information, including the use of appropriate technical and organisational controls to ensure your information is stored, accessed and shared appropriately.

### **12. Third party sites and apps**

12.1 Our websites and app may contain links to other websites and apps operated by third parties. Please note that we are not responsible for information that third parties may collect, store and use through their websites and apps. You should always read carefully the policy of each website and app you visit.

### **13. Changes to our privacy notice**

13.1 This privacy notice will be reviewed regularly. Please check from time to time to see if there are any changes.

### Appendix 1

#### 1. ACCIDENT, SECURITY, ENVIRONMENTAL AND SAFETY INCIDENT RECORDS

##### OCCUPATIONAL HEALTH SCREENING RECORDS

##### PERSONALISED RISK ASSESSMENTS

|                                   |   |
|-----------------------------------|---|
| <b>What we collect:</b>           | Your name, address, occupation, telephone number, email address, age, date of birth, medical conditions, details of the incident or any injuries, a physical description of you, photographs of you, CCTV images of you, and a description of your activities whilst at the airport.  |
| <b>When we collect it:</b>        | Following a security, environmental or safety incident, or accident by asking you to fill out a written form. We may also collect your data from CCTV footage, images or data about you we may hold in relation to your travel, or from other people such as airport staff or witnesses to any safety incident or accident at the airport.  |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"><li>• maintain security within the airport;</li><li>• maintain the health and safety of persons at the airport;</li><li>• fulfil our environmental obligations;</li><li>• ensure the orderly administration and operation of the airport;</li><li>• investigate accidents and incidents occurring at the airport;</li><li>• deal with any complaints or enquiries you make;</li><li>• fulfil our regulatory reporting requirements to our regulators;</li><li>• deal with any legal claims which arise following an accident or incident at the airport; and</li><li>• undertake safety training of persons working at, or visiting, the airport.</li></ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.   |



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### 2. AUTOMATIC NUMBER PLATE RECOGNITION (ANPR)

|                                   |   |
|-----------------------------------|---|
| <b>What we collect:</b>           | Your vehicle registration number.   |
| <b>When we collect it:</b>        | When you make a booking with us, enter or leave an airport car park.  |
| <b>Why we collect it:</b>         | So we can: <ul style="list-style-type: none"> <li>• administer your booking;</li> <li>• charge for entry and exit to certain parts of the airport (including to car parks and passenger collection and drop off points);</li> <li>• permit or restrict access to certain parts of the airport;</li> <li>• maintain security within the airport;</li> <li>• ensure the orderly administration and operation of the airport;</li> <li>• investigate incidents occurring at the airport; and</li> <li>• deal with any complaints or enquiries you make.</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can perform our contract with you and permit the use of a vehicle at the airport.   |

### 3. BOOKINGS

*We do not store your full payment card details on our server. We do pass your full payment card details over a secure encrypted link to our third party payment processor who processes your payment.*

#### 3.1 CAR PARKS

|                            |   |
|----------------------------|---|
| <b>What we collect:</b>    | Your name, address, telephone number, email address, flight information, payment details (card expiry date, card type and card scheme (credit/debit)), vehicle registration number, make, model and colour.   |
| <b>When we collect it:</b> | When you make your booking [and from DVLA after you have made your booking, using your vehicle registration number].  |
| <b>Why we collect it:</b>  | So we can: <ul style="list-style-type: none"> <li>• provide you with access to our car parks;</li> <li>• charge you the correct amount for using our car parks;</li> <li>• maintain security within the airport;</li> <li>• ensure the orderly administration and operation of the airport;</li> <li>• investigate incidents occurring at the airport;</li> <li>• contact you with information in respect of your booking;</li> <li>• contact you with marketing materials (if you have provided your consent for us to do so);</li> <li>• deal with any complaints or enquiries you make; and</li> </ul> |

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|                                   |   |
|-----------------------------------|---|
|                                   | <ul style="list-style-type: none"> <li>• contact you to seek your feedback on our car parking services or your experience at the airport.</li> </ul>  |
| <b>Lawful basis for using it:</b> | <p>So we can perform our contract with you, and</p> <ul style="list-style-type: none"> <li>• ensure the orderly administration of the airport;</li> <li>• deal with any complaints or enquiries you may have; and</li> <li>• send marketing materials to you, based on your consent for us to do so.</li> </ul> |

### 3.2 FAST TRACK

|                                   |  |
|-----------------------------------|--|
| <b>What we collect:</b>           | Your name, address, telephone number, email address, flight information and payment details (card expiry date, card type and card scheme (credit/debit)).  |
| <b>When we collect it:</b>        | When you make your booking.  |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"> <li>• provide you with access to our Fast Track Security lane;</li> <li>• charge you the correct amount for using our Fast Track Security lane;</li> <li>• maintain security within the airport;</li> <li>• ensure the orderly administration and operation of the airport;</li> <li>• investigate incidents occurring at the airport;</li> <li>• contact you with information in respect of your booking;</li> <li>• contact you with marketing materials (if you have provided your consent for us to do so);</li> <li>• deal with any complaints or enquiries you make; and</li> <li>• contact you to seek your feedback on our Fast Track Security lane or your experience at the airport.</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can perform our contract with you, and contact you with marketing materials based on your consent for us to do so.   |

### 3.3 LOUNGES

|                            |  |
|----------------------------|--|
| <b>What we collect:</b>    | Your name, address, telephone number, email address, flight information, date of birth and payment details (card expiry date, card type and card scheme (credit/debit)).   |
| <b>When we collect it:</b> | When you make your booking.  |
| <b>Why we collect it:</b>  | <p>So we can:</p> <ul style="list-style-type: none"> <li>• book your access to the lounge;</li> <li>• charge you the correct amount for access to the lounge;</li> <li>• maintain security within the airport;</li> <li>• ensure the orderly administration and operation of the airport;</li> </ul> |

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|                                   |   |
|-----------------------------------|---|
|                                   | <ul style="list-style-type: none"> <li>• investigate incidents occurring at the airport;</li> <li>• contact you with information in respect of your booking;</li> <li>• contact you with marketing materials (if you have provided your consent for us to do so);</li> <li>• deal with any complaints or enquiries you make; and</li> <li>• contact you to seek your feedback on the lounge you use or your experience at the airport.</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can perform our contract with you, and contact you with marketing materials based on your consent for us to do so.  |

### 4. BUSINESS PARTNERS

|                                   |   |
|-----------------------------------|---|
| <b>What we collect:</b>           | Your name, email address, contact number, vehicle registration number and job title.  |
| <b>When we collect it:</b>        | When it is provided, on request, by you or the organisation you are engaged by.   |
| <b>Why we collect it:</b>         | So we can: <ul style="list-style-type: none"> <li>• maintain an up-to-date crisis communication plan;</li> <li>• respond to emergencies at the airport;</li> <li>• maintain security within the airport;</li> <li>• maintain the health and safety of persons at the airport; and</li> <li>• ensure the orderly administration and operation of the airport.</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.   |

### 5. CANDIDATES AND EMPLOYEES

|                         |  |
|-------------------------|--|
| <b>What we collect:</b> | Your name, telephone numbers, date of birth, email address, addresses, periods of residence, signature, national insurance number, marital status, next of kin, dependants and emergency contacts, gender, nationality, place of birth, work history (including employer/business details, dates of engagements, periods of unemployment and job titles and descriptions), recruitment information (including references), qualifications, proofs of identification (including passports, driving licences etc), criminal records, court judgments, financial history, skills, experience, current job title and employer/business details, and names of educational establishments and years of attendance, remuneration, bank account details, payroll records, tax status, work schedule, performance data through the ACOMS system, leave taken (including |
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|                                   | holiday, sickness absence, family leave and sabbaticals), disciplinary and grievance information, performance information, medical or health conditions information, photographs, results of HMRC employment status check, the results of the vetting process and equal opportunities monitoring information.  |
| <b>When we collect it:</b>        | When you write to or speak with us, complete an application form, apply for a job role or interview or meet with us.   |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"> <li>• correspond with you;</li> <li>• process your job application;</li> <li>• arrange the security vetting checks necessary for you to work at the airport;</li> <li>• maintain personnel records for our employees (if your job application is successful);</li> <li>• comply with our legal obligations;</li> <li>• maintain accurate and up-to-date records; and</li> <li>• demonstrate compliance with our legal obligations to our regulators.</li> </ul> |
| <b>Lawful basis for using it:</b> | So that we can process your job application, make a decision about your recruitment, determine the terms on which you work for us, enter into an employment or other contract with you and meet our obligations under that contract.   |

### 6. COMPETITIONS AND PRIZE DRAWS

|                            |   |
|----------------------------|---|
| <b>What we collect:</b>    | Your name, date of birth, gender, personal interests and preferences, images or recordings of you, address, postcode, telephone number, personal identification document details, email address, social media account usernames, vehicle registration, flight information and/or payment details.   |
| <b>When we collect it:</b> | When you enter any competition or prize draw run by us.   |
| <b>Why we collect it:</b>  | <p>So we can:</p> <ul style="list-style-type: none"> <li>• correspond with you;</li> <li>• run the competition or prize draw;</li> <li>• provide any prizes to the winner(s) of the competition or prize draw; and</li> <li>• publicise the winner(s) of the competition or prize draw on our websites, through our social media channels, through third party media outlets and in our advertising materials.</li> </ul> |

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| <b>Lawful basis for using it:</b> | So we can administer the competition or prize draw, and contact you with marketing materials based on your consent for us to do so. |
|-----------------------------------|---|

### 7. COMPLAINTS, CORRESPONDENCE, PRE-ORGANISED TOURS AND MEETINGS

|                                   |  |
|-----------------------------------|--|
| <b>What we collect:</b>           | Your name, date of birth, telephone number, email address, address, signature, photographic images, vehicle registration numbers, pilot registration (Flyer ID), dates of attending the airport, flight number, payment details, proof of identification (including passport, driving license etc), medical record, details of incidents you are involved in or witness (including date and time), your correspondence history with us, your location (where reporting a noise complaint) and (if you have contacted us via social media), your social media handle. |
| <b>When we collect it:</b>        | When you write to us, meet with us, contact us about a noise complaint, submit a request to operate a drone within our Flight Restriction Zone, or provide information to us in order for us to correspond with you following the use of our services.   |
| <b>Why we collect it:</b>         | So we can: <ul style="list-style-type: none"> <li>• correspond with you;</li> <li>• arrange and administer meetings;</li> <li>• deal with a request to operate a drone within our Flight Restriction Zone;</li> <li>• investigate and record incidents, enquiries or complaints;</li> <li>• safeguard our staff, you and other persons;</li> <li>• maintain the safe and secure ongoing operation of the airport; and</li> <li>• demonstrate compliance with our legal obligations to our regulators.</li> </ul>   |
| <b>Lawful basis for using it:</b> | So we can deal with your complaint or correspondence.  |

### 8. CCTV

|                            |   |
|----------------------------|---|
| <b>What we collect:</b>    | Moving and still images of you whilst you are present at the airport.   |
| <b>When we collect it:</b> | When you are present at the airport.  |
| <b>Why we collect it:</b>  | So we can: <ul style="list-style-type: none"> <li>• maintain security within the airport;</li> <li>• maintain the health and safety of persons at the airport;</li> </ul> |



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|                                   |  |
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|                                   | <ul style="list-style-type: none"><li>• ensure the orderly administration and operation of the airport;</li><li>• investigate incidents occurring at the airport;</li><li>• deal with any complaints or enquiries you make; and</li><li>• undertake safety training of persons working at, or visiting, the airport.</li></ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.  |

### 9. ENTRY DATA

|                                   |  |
|-----------------------------------|--|
| <b>What we collect:</b>           | Your name and access date and time.  |
| <b>When we collect it:</b>        | When you access a secure area at the airport.  |
| <b>Why we collect it:</b>         | So we can: <ul style="list-style-type: none"><li>• maintain security within the airport; and</li><li>• investigate incidents occurring at the airport.</li></ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.  |

### 10. EVENTS, MEETINGS AND TRAINING

|                            |  |
|----------------------------|--|
| <b>What we collect:</b>    | Your name, occupation, date of birth, telephone number, email address, address, signature, medical and dietary requirements, vehicle registration number, date of attending the airport, payment details and proof of identification (including passport, driving licence etc). If you participate in a public entertainment event at the airport, we may collect video and audio recordings of you, or still images of you, during your participation in the public entertainment event.                      |
| <b>When we collect it:</b> | When you write to us or speak with us regarding, or participate in, an event, meeting or training run by us at the airport.  |
| <b>Why we collect it:</b>  | So we can: <ul style="list-style-type: none"><li>• correspond with you;</li><li>• permit you access to certain areas within the airport;</li><li>• run the event, meeting or training you attend or participate in;</li><li>• demonstrate compliance with our legal obligations to our regulators;</li><li>• maintain security within the airport;</li><li>• ensure the orderly administration and operation of the airport;</li><li>• maintain the health and safety of persons at the airport; and</li></ul> |

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|                                   |   |
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|                                   | <ul style="list-style-type: none"> <li>if you have participated in a public entertainment event at the airport, to undertake that event and publicise it (including on our social media feeds, in our advertising and marketing materials and on displays within the airport).</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.   |

### 11. ID CARDS

|                                   |   |
|-----------------------------------|---|
| <b>What we collect:</b>           | Your name, telephone number, date of birth, email address, address, signature, photographic images, vehicle registration number, national insurance number, gender, nationality, place of birth, marital status, next of kin, dependents, emergency contacts, work history (including employer/business details, dates of engagements, periods of unemployment and job titles), proof of identification (including passport, driving licence etc), criminal records, current job title and employer/business details, names of educational establishments, years of attendance, work schedule and attendance, medical or health conditions information and performance data through the ACOMS system. |
| <b>When we collect it:</b>        | When you submit information in your application for an ID card.   |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"> <li>maintain security within the airport;</li> <li>maintain the health and safety of persons at the airport;</li> <li>ensure the orderly administration and operation of the airport;</li> <li>investigate incidents occurring at the airport;</li> <li>maintain accurate and up-to-date records;</li> <li>make a decision about whether you meet the requirements for an airport security pass to be issued to you and whether, after issue, you remain a suitable person to hold a pass; and</li> <li>demonstrate compliance with our legal obligations to our regulators.</li> </ul>  |
| <b>Lawful basis for using it:</b> | So we can comply with our legal obligations.  |

### 12. MARKETING

|                            |  |
|----------------------------|--|
| <b>What we collect:</b>    | Your name, email address and postcode. We also collect information about your email opening habits, e.g. how many times an email is opened/the number of clicks. |
| <b>When we collect it:</b> | When you sign up to our marketing list.  |

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|                                   |   |
|-----------------------------------|---|
| <b>Why we collect it:</b>         | So we can send you marketing materials.   |
| <b>Lawful basis for using it:</b> | So we can contact you with marketing materials based on your consent for us to do so. |

### 13. SECURITY

|                                   |  |
|-----------------------------------|--|
| <b>What we collect:</b>           | Your name, access date and time, gate number, flight information, boarding pass, a photograph of your face, a photograph and x-ray image of items in your possession (which may include photographic images of baggage tags which may contain names, addresses, email addresses and telephone numbers and other personal information you have included), and a scan of your body (although please note that no image of your body is created; software processes the scan data automatically and indicates the areas that need to be checked by highlighting them on a generic mannequin diagram).   |
| <b>When we collect it:</b>        | When: <ul style="list-style-type: none"> <li>• you present your boarding pass to our security officers;</li> <li>• we track your movement using body recognition systems;</li> <li>• we take photograph and x-ray scan of items you place in our x-ray scanners; and</li> <li>• we undertake a body scan.</li> </ul>   |
| <b>Why we collect it:</b>         | So we can: <ul style="list-style-type: none"> <li>• maintain security within the airport;</li> <li>• maintain the health and safety of persons at the airport;</li> <li>• ensure the orderly administration and operation of the airport;</li> <li>• investigate incidents occurring at the airport;</li> <li>• analyse passenger flows through our security lanes for the purpose of forecasting future passenger numbers to ensure sufficient resources are available to cope with demand;</li> <li>• monitor and improve queue times in our security lanes;</li> <li>• demonstrate compliance with our legal obligations to our regulators;</li> <li>• deal with any complaints or enquiries you make.</li> </ul> |
| <b>Lawful basis for using it:</b> | So we can safely and securely administer the airport.  |





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### 14. WEBSITES

|                                   |   |
|-----------------------------------|---|
| <b>What we collect:</b>           | <ul style="list-style-type: none"><li>• How you use the websites, your preferences/settings for our websites, your IP address and details of the device, browser and operating system you use to access our websites.</li><li>• If you create a user account with us on our websites, we will collect your title, name, gender, date of birth, nationality, details of any special assistance requirements you may have, your country of residence, telephone number, postcode, intended travel dates and flight numbers.</li></ul>   |
| <b>When we collect it:</b>        | When you access our websites.   |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"><li>• identify and resolve any errors with our websites' performance;</li><li>• analyse visitor information to help improve the performance of the websites and tailor adverts and information to you;</li><li>• permit your access and use of a user account, if you register for one on our websites;</li><li>• provide you with offers and discounts;</li><li>• ensure certain features of our websites work correctly;</li><li>• monitor the effectiveness of our advertising;</li><li>• contact you with marketing materials (if you have provided your consent for us to do so); and</li><li>• contact you to seek your feedback on our websites or your experience at the airport.</li></ul> |
| <b>Lawful basis for using it:</b> | <p>So we can:</p> <ul style="list-style-type: none"><li>• send you marketing materials, based on your consent for us to do so;</li><li>• provide you with a discount or offer correctly or permitting a third party to do so in respect of any our discounts or offers which you seek to use;</li><li>• deal with your comments and queries and the administration of the airport, in respect of forms and feedback you submit in relation to the airport; and</li><li>• provide functioning, secure, relevant and easy to navigate websites.</li></ul>   |



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## Privacy Policy

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### 15. WIFI

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|-----------------------------------|--|
| <b>What we collect:</b>           | Your name, email address, date of birth, unique device ID, flight information, the MAC address of your electronic device and details of the browser you use to access our websites.  |
| <b>When we collect it:</b>        | When you register to connect to our WiFi.  |
| <b>Why we collect it:</b>         | <p>So we can:</p> <ul style="list-style-type: none"><li>• provide access to our WiFi connection;</li><li>• prevent misuse of our WiFi connection;</li><li>• analyse visitor information to help improve the performance of our WiFi and tailor adverts and information to you.</li></ul> |
| <b>Lawful basis for using it:</b> | So we can provide a functioning, relevant and easy to use WiFi connection which is not misused, and contact you with marketing materials, based on your consent for us to do so.   |