

Blackbushe Airport Data Protection Policy

1. INTRODUCTION

Blackbushe Airport Ltd needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

This data protection policy ensures Blackbushe Airport Ltd:

- > Complies with data protection law and follow good practice
- > Protects the rights of staff, customers and partners
- > Is open about how it stores and processes individuals' data
- > Protects itself from the risks of a data breach

1.1. Legislation

The Data Protection Act 1998 describes how organisations - including Blackbushe Airport Ltd - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

2. SCOPE, RISKS & RESPONSIBILITIES

This policy applies to:

- > The head office of Blackbushe Airport Ltd, located at Terminal Building, Blackbushe Airport, Camberley, Surrey, GU17 9LQ
- > All staff and volunteers of Blackbushe Airport Ltd
- > All contractors, suppliers and other people working on behalf of Blackbushe Airport Ltd

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- > Names of individuals
- > Postal addresses
- > Email addresses
- > Telephone numbers

...plus any other information relating to individuals

2.1. Data Protection Risks

This policy helps to protect [company name] from some very real data security risks, including:

- > Breaches of confidentiality. For instance, information being given out inappropriately.
- > Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.

- > Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

2.2. Responsibilities

Everyone who works for or with Blackbushe Airport Ltd has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- > The Managing Director is ultimately responsible for ensuring that Blackbushe Airport Ltd meets its legal obligations.
- > The Airport Manager is responsible for:
 - > Keeping the Managing Director updated about data protection responsibilities, risks and issues.
 - > Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - > Arranging data protection training and advice for the people covered by this policy.
 - > Handling data protection questions from staff and anyone else covered by this policy.
 - > Dealing with requests from individuals to see the data Blackbushe Airport Ltd holds about them (also called 'subject access requests').
 - > Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
 - > Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - > Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - > Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- > The Business Development Manager is responsible for:
 - > Approving any data protection statements attached to communications such as emails and letters.
 - > Addressing any data protection queries from journalists or media outlets like newspapers.
 - > Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

3. **GENERAL GUIDELINES**

- > The only people able to access data covered by this policy should be those who need it for their work.
- > Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- > Blackbushe Airport Ltd will provide training to all employees to help them understand their responsibilities when handling data.
- > Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
 - > In particular, strong passwords must be used, and they should never be shared.
 - > Personal data should not be disclosed to unauthorised people, either within the company or externally.
 - > Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- > Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

4. DATA STORAGE

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Airport Manager.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- > When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- > Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- > Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- > Data should be protected by strong passwords that are changed regularly and never shared between employees.
- > If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- > Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing services.
- > Servers containing personal data should be sited in a secure location, away from general office space.
- > Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- > Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- > All servers and computers containing data should be protected by approved security software and a firewall.

5. DATA USE

Personal data is of no value to Blackbushe Airport unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- > When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- > Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- > Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorised external contacts.
- > Personal data should never be transferred outside of the European Economic Area.
- > Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

6. DATA ACCURACY

The law requires Blackbushe Airport Ltd to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Blackbushe Airport Ltd should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- > Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- > Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- > Blackbushe Airport Ltd will make it easy for data subjects to update the information it holds about them. For instance, via the company website.
- > Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

7. SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Blackbushe Airport are entitled to:

- > Ask what information the company holds about them and why.
- > Ask how to gain access to it.
- > Be informed how to keep it up to date.
- > Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the Airport Manager at admin@blackbusheairport.co.uk. Individuals will be charged £10 per subject access request. The Airport Manager will aim to provide the relevant data within 14 days.

The Airport Manager will always verify the identity of anyone making a subject access request before handing over any information.

8. DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies, the UK Civil Aviation Authority, and the Air Accident Investigation Branch without the consent of the data subject.

Under these circumstances, Blackbushe Airport Ltd will disclose requested data. However, the Airport Manager will ensure the request is legitimate, seeking assistance from the Managing Director and from the company's legal advisers where necessary.

9. PROVIDING INFORMATION

Blackbushe Airport Ltd aims to ensure that individuals are aware that their data is being processed, and that they understand:

- > How the data is being used
- > How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company. [This is available on request. A version of this statement is also available on the company's website.]

Blackbushe Airport Privacy Policy

1. INTRODUCTION

This privacy policy describes how Blackbushe Airport Ltd protects and makes use of the information you give the company when you provide us information, either through our website, via email, or in person.

If you are asked to provide information when using this website, it will only be used in the ways described in this privacy policy. This policy is updated from time to time, the version number and date of review is included in the header of this document. The latest version of this policy will be available on the company website (www.blackbusheairport.co.uk)

If you have any questions about this policy, please email admin@blackbusheairport.co.uk or write to:

Airport Manager
Blackbushe Airport Ltd
Terminal Building
Blackbushe Airport
Camberley
Surrey
GU17 9LQ

We gather and use certain information about individuals in order to provide products and services and to maintain records as required by law enforcement agencies, and regulatory authorities such as the UK Civil Aviation Authority and the Air Accident Investigation Branch.

We also collect information to better understand how visitors use our company website and to present timely, relevant information to them.

2. WHAT DATA WE GATHER

We may collect the following information:

- > Name & Photograph
- > Contact information including postal address, telephone numbers, and email addresses
- > Pilot licence, Passport, and Aircraft information
- > Car registration details
- > Payment information, such as bank details, credit and debit cards.
- > Website usage data
- > Other information relevant to client enquiries
- > Other information pertaining to special offers and surveys

3. HOW WE USE THIS DATA

Collecting this data helps us deliver our products and services, understand what you are looking from the company, enabling us to deliver improved products and services.

Specifically, we may use data:

- > For security of the airport site and aircraft located onsite
- > To communicate safety critical information to pilots and other stakeholders
- > To facilitate automatic payment systems for services
- > For our own internal records.
- > To improve the products and services we provide.
- > To contact you in response to a specific enquiry.
- > To customise the company website for you.
- > To send you promotional emails about products, services, offers and other things we think might be relevant to you.
- > To send you promotional mailings or to call you about products, services, offers and other things we think might be relevant to you.
- > To contact you via email, telephone or mail for market research reasons.

4. COOKIES AND HOW WE USE THEM

4.1. What is a cookie?

A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit.

4.2. How we use cookies

We may use cookies to:

- > Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- > Identify whether you are signed in to our website. A cookie allows us to check whether you are signed in to the site.
- > Test content on our website. For example, 50% of our users might see one piece of content, the other 50% a different piece of content.
- > Store information about your preferences. The website can then present you with information you will find more relevant and interesting.
- > To recognise when you return to our website. We may show your relevant content or provide functionality you used previously.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

4.3. Controlling cookies

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies.

However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you.

Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it. To learn more about cookies and how they are used, visit All About Cookies (www.allaboutcookies.org).

5. CONTROLLING INFORMATION ABOUT YOU

When you fill in a form or provide your details on our website, you will see one or more tick boxes allowing you to:

- > Opt-in to receive marketing communications from us by email, telephone, text message or post.
- > Opt-in to receive marketing communications from our third-party partners by email, telephone, text message or post.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via one of these methods:

- > Clicking an unsubscribe link in a marketing email
- > Send an email to admin@blackbusheairport.co.uk
- > Write to us at:

Airport Manager
Blackbushe Airport Ltd
Terminal Building
Blackbushe Airport
Camberley
Surrey
GU17 9LQ

Please note, if you are a pilot based at Blackbushe Airport, and a holder of an airport ID card it is not possible to unsubscribe from email safety notices issued by Airport Management without surrendering your ID card and losing flying privileges. This measure is in order to ensure that critical safety information is communicated without fail.

We will never lease, distribute or sell your personal information to third parties unless we have your permission, or the law requires us to.

Any personal information we hold about you is stored and processed under our data protection policy, in line with the Data Protection Act 1998.

6. SECURITY

We will always hold your information securely. To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards. We also follow stringent procedures to ensure we work with all personal data in line with the Data Protection Act 1998.

7. LINKS FROM OUR WEBSITE

Our website may contain links to other websites. Please note that we have no control of websites outside the [domain name] domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy. Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.