

Data Protection Policy

Background, Purpose and Scope

Background

1. All Glasgow Prestwick Airport employees, temporary staff, consultants, contractors and third parties have a duty to protect Glasgow Prestwick Airport data that they create, store, process or transfer.
2. At a minimum, Glasgow Prestwick Airport must ensure data protection standards within the company meet the regulations set out within the EU General Data Protection Regulation 2016 (GDPR) [12]. The following document sets out the requirements for Glasgow Prestwick Airport employees, third parties and other stakeholders, to fulfil these regulatory obligations.

Purpose

3. The purpose of this document is to specify and communicate the Glasgow Prestwick Airport policy on data protection. In particular:
 - a. To ensure data protection good practice across the organisation;
 - b. To ensure compliance with GDPR [12] and other applicable legislation and regulation related to personal data.
4. This document outlines internal policy in respect of data handling, but this policy is subject to all the laws, rules and regulations that Glasgow Prestwick Airport is governed by. In the event this policy allows employees of Glasgow Prestwick Airport to exercise discretion, such discretion must be exercised within the confines of Glasgow Prestwick Airport's statutory obligations and must not contravene any of its legal, accounting or other regulatory requirements.

Scope

5. This policy applies to all Glasgow Prestwick Airport personnel irrespective of status, including temporary staff, contractors, consultants, and third parties.

Statement of Policy

6. It is the policy of Glasgow Prestwick Airport to ensure that all data shall be protected in proportion to the sensitivity of the data, and in line with all legal and regulatory requirements.

Requirements

7. All data created, stored, processed and transferred shall be handled with respect to the Glasgow Prestwick Airport Data Handling Policy [3].

Personal Data

8. Personal data shall be protected by the implementation of appropriate technical and organisational measures and integration of necessary safeguards, taking into account:
 - a. the state of the art;
 - b. the cost of implementation;
 - c. the nature, scope, context and purposes of processing the data;
 - d. the risks to rights and freedoms of persons posed by the processing.
9. Appropriate technical and organisational measures shall be implemented for ensuring that, by default:
 - a. personal data **collection** is limited to that which are necessary for each specific purpose of the processing;
 - b. personal data **processing** is limited to that which are necessary for each specific purpose of the processing;
 - c. personal data **access** is limited to that which are necessary for each specific purpose of the processing;
 - d. the **storage period** of all personal data is limited to that which are necessary for each specific purpose of the processing.

Purposes For Which Data Is Held within Glasgow Prestwick Airport

10. Personal data relating to employees is collected primarily for the purposes of:
 - a. Recruitment, promotion, training, redeployment and/or career development;
 - b. Administration and payment of wages;
 - c. Calculation of certain benefits including pensions;
 - d. Disciplinary purposes arising from an employee's conduct or inability to perform his/her duties;
 - e. Performance review;
 - f. Recording of communication with employees and their representatives;
 - g. Compliance with policy and/or legislation with regard to health and safety or other employment legislation;
 - h. Provision of references to financial institutions, to facilitate entry onto educational courses and/or to assist future potential employers;
 - i. Staffing levels and career planning.

(This list is an non- exhaustive list)

11. To hold sensitive or special category personal data, the Company must additionally satisfy a sensitive data condition. The most appropriate condition for employment purposes is that the processing is necessary to enable the Company to meet its legal obligations (for example, to ensure health and safety or to avoid unlawful discrimination). The employee's **explicit written consent** will be sought at the point at which sensitive or special category personal data is collected.
12. Glasgow Prestwick airport may at times process personal data from customers and outside organisations in order to carry out its business functions. This policy covers all forms of personal data and is not solely restricted to employee personal data.
13. Under GDPR (Article 37) it is the duty of Glasgow Prestwick Airport to appoint a designated Data Protection Officer (DPO). Glasgow Prestwick Airport shall have a designated Data Protection Officer (DPO) at all times. The role is under taken by the Data Protection and Information Manager
14. All personnel shall ensure that the Data Protection and Information Manager is involved with all issues relating to the protecting of data with Glasgow Prestwick Airport. Also, data protection advice is sought from the Data Protection and Information Manager where needed in all issues which relate to the protection of personal data. This should be done in a properly and timely manner.
15. All personnel shall support the DPO in performing his/her tasks, these tasks shall be carried out without influence on or consequence to the DPO and without any conflict of interest.
16. The DPO shall be designated on the basis of (amongst other capabilities) professional qualities and expert knowledge of data protection law and practices.
17. Glasgow Prestwick Airport shall publish the contact details of the DPO and communicate them to the relevant data protection supervisory authority (The Information Commissioner's Office in the UK).
18. The DPO shall have at least the following tasks:
 - a. to inform and advise Glasgow Prestwick Airport and its employees who carry out processing of their obligations pursuant to GDPR [12] and other data protection provisions;
 - b. to monitor compliance with GDPR [12], other data protection provisions and Glasgow Prestwick Airports policies in relation to the protection of personal data;
 - c. to provide advice where requested as regards the data protection impact assessment and monitor its performance;
 - d. to cooperate with the supervisory authorities;
 - e. to act as the contact point for the supervisory authorities on issues relating to personal data processing.

Roles and Responsibilities

19. All personnel are responsible for the records they create, use and store.
20. Managers are directly responsible for implementing this policy within their functional areas, and for adherence by their employees.
21. The Data Protection and Information Manager has direct responsibility for maintaining this policy and providing advice on implementation.

Approvers	GPA	HR Director	Sonia Rafferty
Owner	GPA	Data Protection & Information Manager	Annette Greening
Authors			
	GPA	Data Protection & Information Manager	Annette Greening
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Related Documents

Type	Name	Version	Ref
Policy	Data Handling Policy	INFGOV/01/03 Version 1	[3]
Policy	Data Protection Impact Assessment Policy	INFGOV/01/04 Version 1	[4]
Policy	Subject Request Policy	INFGOV/01/05 Version 1	[5]
Procedure	Subject Request Procedure	INFGOV/01/11 Version 1	[11]
External Publication	EU General Data Protection Regulation (GDPR)	27 Apr 2016	[12]

References to the above documents are denoted by square brackets (e.g. '[1]').