

Privacy Notice – Closed Circuit Television & Car Parking Automated Number Plate Recognition (ANPR) System

Introduction

Glasgow Prestwick Airport (GPA) uses personal information for a range of purposes and our privacy notices provide information about why we obtain and collect personal information, and how we process it.

Under the General Data Protection Regulation (GDPR), GPA is required to provide information about how personal information that we obtain is processed.

This privacy notice explains how GPA uses images captured by:

- i. Closed Circuit Television (CCTV);
- ii Car Parking – Automated Number Plate Recognition (ANPR) System

CCTV

What Information is Collected?

When you pass through GPA, we will collect static or moving images via our CCTV system. GPA collects imagery via CCTV cameras located throughout the airport, in both landside (public) and airside (restricted access) locations. All locations, internally and externally, where CCTV systems are in operation have appropriate signage to inform individuals that CCTV cameras are in use.

How will my information be used?

CCTV images are collected for a number of purposes including but not limited to the following:

- Meeting statutory obligations and provide evidence of regulatory compliance to Department of Transport (DfT) And Civil Aviation Authority (CAA);
- Enabling the appropriate safety and operational management of GPA;
- For investigative purposes or as evidence to support any formal follow-up to airport incidents;
- Supporting general employment purposes, which may include employees of organisations contracted to supply services by GPA;
- Safeguarding the legitimate interests of the organisation and individuals whilst supporting management and training operations;
- Providing evidence for audits (by both internal and external auditors, as well as regulators that have a legal right of access to information held by GPA), and to assist with the investigation of security and safety related incidents.
- Assisting with the prevention and detection of crime and other matters such as missing person enquiries.
- In response to a subject access request.

The legal basis for this data usage would be **legal obligation** and **legitimate interest**.

Will my information be passed to anyone else?

Employee's responsible for the functions and purposes listed above will process the information collected by the CCTV system. This may include employees from external organisations (for example, regulators) where they carry out the purposes stated above.

GPA is the sole operator of the onsite CCTV system and does not use a data processor to manage and maintain the CCTV systems.

Images and other information held by CCTV systems are not transferred internationally by GPA.

Other than described above, GPA will never pass images to any other third party, unless there is a statutory requirement to do so or the processing is otherwise lawful.

What happens when my information is no longer required?

CCTV images are retained for 30 days, after which they are destroyed. In exceptional circumstances, images may be retained for longer where they are used for certain purposes described above, for example where they are used as evidence in an investigation. In these cases, the images will be retained in accordance with GPA's and regulatory retention schedules.

Car Parking Automated Number Plate Recognition (ANPR) System

This privacy notice deals with information that we process about individuals who use GPA's car parking facilities which are managed by an Automatic Number Plate Recognition (ANPR) system. Please note that this notice does not cover the processing of information when purchasing car park tickets with third-party on-line providers your personal data privacy in this instance will be the responsibilities of the third-party provider.

Why are We Collecting Your Information?

Your information is being collected for the purposes of managing and administering car parking. The information we collect about you is required to check you are entitled to access the car parking facilities available at GPA.

What Information is Collected?

In order to use the car parking facilities at GPA we ask you to provide:

- Vehicle information including vehicle registration number, this is stored on the GPA ANPR system.
- For those working at the airport, information about your role, employer and/or reason access is required

How will my information be used?

Your information will be used to provide access and egress to GPA car parks that use an ANPR system. This means that the lawful basis for processing your information is for contractual reasons. Your information will be added to and held on the GPA ANPR database and used to determine whether you should be given access to the restricted area parking facilities. Where you are eligible, this will allow you to manage access and egress to and from the car parks using the vehicle registration number.

No information will be stored in the ANPR database about vehicles entering or leaving car parks unless it belongs to a person who is entitled to park in the restricted area facilities. This would include all customers using GPA car parking facilities and all employees and contractors using the car park facilities.

Will my information be passed to anyone else?

Your information will be processed by the administration or customer service team within the airport. GPA will never pass images to any other third party, unless there is a statutory requirement to do so or the processing is otherwise lawful, for example if requested by the police as evidence in the detection and prevention of crime.

What happens when my information is no longer required?

Your details will be stored on the database while you are eligible to use the car parks and will be removed no more than 30 days after your eligibility is revoked, withdrawn or surrendered for any reason.

Information relating to eligible vehicles accessing and egressing from the car parks is retained for 30 days, after this time, information may be retained for statistical reasons although will not include personal data.

Additional Rights

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- request access to your personal information;
- request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay;
- request erasure of your personal information when certain conditions apply;
- restrict processing under certain circumstances;
- object to processing;
- data portability in some circumstances.

There may be occasions when GPA is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why GPA are unable to comply with the request and any options available to you.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time, however, no personal information processed by GPA's CCTV systems is processed under this basis.

Contact Details

GPA is the Data Controller (or Controller) of images collected by its CCTV system. If you have any queries relating to CCTV at GPA or queries regarding the information in this privacy notice, please contact the GPA Data Protection Officer – dataprotection@glasgowprestwick.com

For matters relating to airport car parking please contact the GPA information desk in the first instance.

Complaints

Should you be unhappy with the way in which GPA have processed your personal data, you have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk>