

## **Privacy Notice – Closed Circuit Television**

### **Introduction**

Highland and Islands Airports Limited (HIAL) is a public corporation wholly owned by the Scottish Ministers. The company operates and manages 11 Airports at Barra, Benbecula, Campbeltown, Dundee, Islay, Inverness, Kirkwall, Stornoway, Sumburgh, Tiree and Wick. HIAL's airports are vital to the social and economic welfare of the areas they serve, but are loss making, and are supported by subsidies from the Scottish Government in accordance with Section 34 of the Civil Aviation Act 1982.

HIAL 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), HIAL is required to provide information about how personal information that we obtain is processed.

This privacy notice explains how HIAL uses images captured by Closed Circuit Television (CCTV).

### **What Information is Collected?**

HIAL collects images using CCTV systems at most of our airport locations.

### **How will my information be used?**

CCTV images are collected for a number of purposes including:

- i. Meeting statutory obligations laid down by aviation regulations and legislation;
- ii. Enabling the appropriate safety and operational management of airports;
- iii. Supporting general employment purposes, which may include employees of organisations contracted to supply services by HIAL;
- vi. Safeguarding the legitimate interests of the organisation and individuals whilst supporting management and training operations;
- vii. 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 HIAL), and to assist with the investigation of security and safety related incidents.
- viii. Assisting with the prevention and detection of crime and other matters such as missing person enquiries.

HIAL has a legal obligation to operate CCTV in certain parts of some of its airports, which is laid down by the UK Single Consolidated Direction (Aviation) 2017 (SCD No. 1/2017). The Single Consolidated Direction sets out the more stringent measures to the common basic standard on civil aviation security applicable to the UK, as permitted by Article 6 of Regulation (EC) No 300/2008. Many of the other functions and purposes have a basis in law and processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the controller.

Occasionally, processing will be carried out in the legitimate interests of the controller as described above, and processing may also be carried out where it can be justified using one

or more of the exemptions under data protection law, in particular those relating to crime and taxation.

### **Will my information be passed to anyone else?**

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

HIAL uses a data processor to manage and maintain the CCTV systems. Data processing agreements are place with all organisations that process personal information on HIAL's behalf, which require processing to be carried out within the EEA, or for appropriate safeguards to be in place where it is carried out by an international organisation. As far as we are able to establish, images and other information held by CCTV systems are not transferred internationally.

Other than described above, HIAL 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 HIAL's retention schedules.

### **Additional Rights**

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

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

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information. Details of recipients can be found under the section [Will My Information be Passed to Anyone Else?](#)

There may be occasions when HIAL 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 HIAL is 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 CCTV systems is processed under this basis. You can find out how your personal information is being lawfully processed under the section [How Will My Information Be Used?](#)

### *Complaints*

Should you be unhappy with the way in which HIAL 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/>.

### **Contact Details**

HIAL is the Data Controller (or Controller) images collected by the CCTV. Website: <http://www.hial.co.uk/>.

If you have any queries relating to CCTV at a particular airport, please contact the information desk in the first instance. If you have any queries regarding the information in this privacy notice, please contact the Data Protection Officer, Liz Taylor – [ltaylor@hial.co.uk](mailto:ltaylor@hial.co.uk).