

Privacy Notice – Using a HIAL Car Park Managed with an ANPR System

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.

This privacy notice deals with information that we process about those who use HIAL's car parking facilities at Inverness, Kirkwall, Stornoway and Sumburgh airports that are managed by an Automatic Number Plate Recognition (ANPR) system. This notice also covers the processing of personal information when people apply for an inter-island exemption for car parking charges at Kirkwall and Sumburgh airports. Please note that this notice does **not** cover the processing of information to purchase car park tickets on-line.

Why are We Collecting Your Information?

Your information is being collected for the purposes of managing and administering car parking, including exemptions from car parking charges for eligible residents.

The information we collect about you is required to check you are either:

- Entitled to access the car parking facilities available (Inverness); or
- Eligible for an exemption from the parking charges and, if so, are able to access and egress HIAL's parking facilities without incurring a charge (Kirkwall and Sumburgh).

What Information is Collected?

For Inverness Airport and the Inter-Island passengers, we ask you to provide:

- Name
- Vehicle information including vehicle registration number
- Address and proof of residency (for those applying for a fee exemption)
- For those working at an airport, information about your role, employer and/or reason a pass is required

For those eligible for a fee exemption as they are an NHS patient or travelling for compassionate reasons, the relevant airport will need to see information that demonstrates you are eligible for an exemption. We will not retain any information relating to NHS patients or those travelling for compassionate reasons. Further information about the information that is acceptable for validating your car parking ticket is available from <http://www.hial.co.uk/wp-content/uploads/2018/06/Car-parking-leaflet.pdf>. Information relating to being an NHS patient is processed based on your consent and you do not have to apply for an exemption from parking fees unless you wish to do so.

How will my information be used?

Your information will be used to provide access and egress to airport car parks that use an ANPR system (as listed above) and allow HIAL to provide an exemption from parking fees. This means that the lawful basis for processing your information is for contractual reasons.

At Inverness airport, your information will be added to the ANPR database and used to determine whether you should be given access to the restricted area parking facilities. Access is usually provided as part of an employment contract.

At Kirkwall and Sumburgh airports, your information will be used to:

- Determine whether you are eligible for the car park charge exemption;
- Where you are eligible, to manage access and egress to and from the car park using the vehicle registration number. This is done by holding your details in the ANPR database.

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 (Inverness), or eligible for the car park fee exemption (Kirkwall and Sumburgh).

Will my information be passed to anyone else?

Your information will be processed by the administration or customer service team in the relevant airport. In some of our airports, parking facilities are managed on HIAL's behalf usually by the contractor responsible for Facilities Management.

What happens when my information is no longer required?

At Kirkwall and Sumburgh Airports, proof of residency is destroyed once an application is approved by the relevant airport. The airport will update the application forms to state what proof was provided and that it was accepted and, where you are eligible for a fee exemption, your information will be added to the ANPR database.

The forms will be retained for 90 days after your details are removed from the ANPR database. 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:

- 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.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time. You should be aware that, while HIAL will stop using your information for that purpose with immediate effect, it may not always be possible to remove information from the public domain, for example where it has been used in hard copy publications. You should also be aware that the ability to withdraw consent only applies to information considered to be personal. It does not usually apply to information about groups or organisations. 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's Data Protection Officer is Liz Taylor at ltaylor@hial.co.uk. For matters relating to airport car parking, please contact the information desk at your local airport in the first instance.