

Privacy Notice – Security Culture Survey

Introduction

Highland and Islands Airports Limited (HIAL) is 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. Working with our partners and stakeholders, HIAL is committed to supporting the essential socio-economic role of aviation in Scotland by maintaining and developing our airports and the vital services and connections they provide for some of our country's more remote communities.

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 individuals who complete the Security Culture Survey. This document explains how your personal data is used and signposts how you can exercise your privacy rights.

Why are we collecting your information?

We are collecting information from you to help us understand the Security culture in place at each of our airports as well as across the broader HIAL network.

The Survey is aligned with the CAA Security Management System framework and will allow us to identify where improvements can be made.

What information is collected?

The information we collect from you will be:

- Working Location/ Airport
- Department/ Area
- Role Band

We are not collecting names or any contact details. However, the information which is collected could in some circumstances infer identity of individuals. Personal data is information relating to an individual who can be identified or who are identifiable, directly from the information; or who can be indirectly identified from that information in combination with other information.

How will my information be used?

Lawful Basis

Depending on the processing activity, our use of your personal data falls within different lawful grounds under the UK GDPR.

- For the purposes of a legitimate interest

To comply with the data minimisation principle, we ensure that we only collect and process information, which is adequate, relevant, and necessary for the reasons for which it is processed.

Will my information be passed to anyone else?

Your personal information will not be passed to any other third parties. Your personal information will not be transferred to any countries that are outside of the UK.

Any information submitted will be processed by HIALs Corporate Security team who will produce statistical analysis to report to the CAA, key stakeholders, and wider airport community.

What happens when my information is no longer required?

We retain your personal information for as long as necessary to fulfil the purposes for which we collected it. The survey responses will be disposed of after 24 months.

The reports will be held for active year plus an additional 6 years, to enable year on year comparisons to be made.

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.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information.

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.

For more information on how to exercise any of these rights, please contact the Data Protection Officer at dpo@hial.co.uk.

You can find independent advice about personal data rights provided by the [Information Commissioner's Office](#)

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/>