

Privacy Notice – use of personal information for publication

Introduction

Highland and Islands Airports Limited (HIAL) is a Non-Departmental Public Body, wholly owned by the Scottish Ministers. As one of the country's leading regional airport operators, HIAL runs 11 airports across Scotland – at Barra, Benbecula, Campbeltown, Dundee, Islay, Inverness, Kirkwall, Stornoway, Sumburgh, Tiree and Wick John O'Groats. HIAL's airports are vital to the social and economic welfare of the communities they serve but are loss-making and supported by subsidies from the Scottish Government.

Why are We Collecting Your Information?

HIAL collects and obtains a variety of information for use in promotional material and for providing key information about services. This may include use in magazines, posters, adverts and brochures, for use on an on-line platform or communications such as our website or social media, and our internal intranet or digital updates for staff.

What Information is Collected?

The information being collected will depend upon how it is going to be used. The types of personal information we collect includes:

- Your personal feedback or opinion about our services
- A narrative documenting your experience relating to one or more services that HIAL provides
- A news story that relates to HIAL in any capacity
- Images captured in any media

In addition to promotional information, we will usually collect your personal contact details where they are required, for example, if we need to contact you to follow up a news article, and also so that we are able to manage your rights under data protection legislation. We will not publish your contact information unless it has been explicitly agreed with you.

How will my information be used?

Your personal information will be used for promotional purposes which includes hard copy and on-line publications. These vary as new advertising platforms become available. HIAL may also retain images and text in a resource library for future promotional use.

Where a person is identifiable from text or images, HIAL will usually process your personal information based on your consent and will usually ask you to sign a form to say that the information in this notice has been made available to you and that you consent to your personal information being used for this purpose. **Please note that regardless of your relationship to HIAL,**

whether you are a service user, contractor or employee, you are not required to give your consent if you do not wish to participate.

There are some limited circumstances in which your personal information may be processed using legitimate interests as it is in HIAL's legitimate interests to collect and use information that will allow it to promote the services that are offered. This will usually be when you are not easily identifiable, or there were a large number of people participating in an event and it was not feasible to collect consent from every individual, or if you are a HIAL employee.

Please note that, even in these circumstances, you will be made aware that activities are taking place and be given an opportunity to move away from the area affected, for example, a location where filming is taking place or pictures are being taken.

There may be occasions where other organisations record audio or video at HIAL locations, for example, journalists and TV crews. Please note that HIAL is unlikely to be controller for the information obtained and it is likely to be subject to an exemption under data protection laws. For further information you should contact the organisation managing the activity.

Will my information be passed to anyone else?

HIAL may contract organisations to collect and manage promotional activities on our behalf.

Data processing agreements are in 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.

Please note – where you have provided your consent, your personal information may be posted on our website or a social media platform. It may also be included in a hard copy publication. This means that your personal information is highly likely to be transferred outside of the EEA.

Your rights (detailed below) will still apply although once published in any media, HIAL will be limited in the way in which it is able to apply your rights to subsequent uses of the information by other individuals or organisations.

The information in this privacy notice applies to all information collected by HIAL. There may be occasions when other people post images or other personal information relating to third parties to HIAL's social media platforms. HIAL will manage that information as described above and actively encourages those posting information to ensure they have the necessary consent and permissions to post images.

What happens when my information is no longer required?

HIAL's promotional resources are regularly reviewed and retained for as long as they remain relevant. They will be securely destroyed when they are no longer required.

Additional Rights

Under the UK GDPR, you have several 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 we would like an opportunity to resolve the matter and you should contact the DPO (dpo@hial.co.uk) in the first instance. 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/>

Declaration of Consent: Publication of Personal Data

Between

Highlands and Islands Airports Limited

Head Office, Inverness Airport, Inverness IV2 7JB

and

First Name		Last Name	
Address*		E-mail*	
Telephone number*			

*Optional – required to verify identity in future correspondence.

Subject matter

Promotional material including feedback, text, audio or images of the person named above.

Purpose(s) of Obtaining and Subsequent Use of Personal Information:

Publication in material including but not limited to use on social media platforms, websites, HIAL’s intranet and in hard copy publications. This may include advertisements commissioned by HIAL. For full details see privacy notice.

Declaration of Consent

I, the undersigned, give my consent for the use of my personal information, including images where collected, for the purposes described above. Use of the photographic images for purposes other than those described above is not permitted unless HIAL has a lawful basis to do so.

I understand that I am not required to participate in this initiative and am under no obligation to provide any personal information. Should I choose not to participate, I understand that no records of that decision will be retained.

I understand that I can withdraw my consent at any time by contacting HIAL communications@hial.co.uk.

Signature _____ Date _____ Location _____

Personal Information Relating to Children

I confirm that I have parental responsibility for the children named below (who are less than 16 years old) and consent to the use of their personal information, including images where collected, for the purposes described above.

Name		Name	
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Signature _____ Date _____