

Privacy Notice – Data Collection through our Websites

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.

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 outlines how we collect and use your information for marketing purposes where it is gathered through www.hial.co.uk and <http://www.invernessairport.co.uk>

There are four sections in this privacy notice:

1. [Visitors to HIAL websites](#)
2. [Car park bookings on Inverness Airport website](#)
3. [Information for those who subscribe to receive our enews / marketing](#)
4. [Providing feedback or making a complaint](#)

1. Visitors to Our Websites

Why are We Collecting Your Information?

HIAL strives to continually improve the services and facilities offered throughout the highlands and islands and the website is a vital tool used to communicate information about those services.

What Information is Collected?

We collect information from visitors to our websites to help us ensure our websites function correctly and allow us to profile visitors. Information collected includes IP address, device type, and cookies relating to preferences. See below for further details about cookies.

The information obtained in this way, which includes demographic data and browsing patterns, is only used in aggregate form, and is not used by HIAL to identify you. This aggregate information is used to:

- build up marketing profiles
- aid strategic business development
- audit usage of the site
- improve the content and functionality on the website

Some of the information collected may be used to provide you with targeted advertising, which helps to ensure the content displayed is relevant and likely to be of the most interest to you.

Some of our services provided through the HIAL websites require us to collect personal information in for us to provide you with those services, and these are explained further below.

Use of cookies

We track the patterns of behaviour of visitors to our site. This can include using a “cookie” which is stored on your browser. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect the information from the browser. If you would like to learn more about the use of cookies you can find information at <http://www.youronlinechoices.com/uk/>

How will my information be used?

We process personal information collected about those visiting the websites for the purposes of providing the best possible service.

Lawful Basis

Processing personal information under data protection laws requires a lawful basis and in the case of collecting personal information about the effectiveness of our website, it is processed under HIAL’s legitimate interests. It is essential that HIAL provides lifeline services to the highlands and islands, and continues to meet the expectations of our wide range of service users and stakeholders.

International Transfer

Some information collected through the HIAL website is transferred internationally and is safeguarded by the Privacy Shield scheme. Any organisation processing personal information on HIAL’s behalf is subject to a data processing agreement that has specific requirements relating to transfers, and must ensure adequate safeguarding arrangements are in place.

Will my information be passed to anyone else?

HIAL uses data processors to process personal data on our behalf, including those that provide web-based services, and some services that are delivered through the HIAL websites. Your information is not passed to any other third party.

What happens when my information is no longer required?

Information collected about website users is kept for varying lengths of time although in any event, no longer than 3 years.

2. Car park bookings on Inverness Airport website

Why are We Collecting Your Information?

We are collecting your information to provide you with car parking services at Inverness Airport.

What Information is Collected?

We collect the information necessary for providing you with car parking services. At the time of booking, we collect:

- Name and the personal details
- Contact information including home address and e-mail address
- Company name if applicable
- Vehicle information
- Dates parking is required (entry date and time and exit date and time)We also provide an opportunity to subscribe to marketing and promotions. The booking process collects payment information although this is obtained and processed by a third party

We also collect information to help us improve our website and ensure that the services we offer you are fit for purpose. This is collected using cookies and further information can be found under the Use of Cookies section of this privacy notice.

How will my information be used?

We process personal information collected to manage the services you have purchased through our website.

Lawful Basis

Processing personal information under data protection laws requires a lawful basis and in the case of purchasing services, it is for the purposes of entering into, or for the performance of a contract.

International Transfer

Personal information collected for the purposes of managing car parking is not transferred outside of the EEA.

Will my information be passed to anyone else?

HIAL uses data processors to process personal data on our behalf, including those that provide IT services. 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.

HIAL uses a third party to process payments made for car parking who gather and process payment information for their own purposes.

HIAL has a contracted service for the provision of a Data Protection Officer and your information may be processed in the course of providing that service, for example for the purposes of auditing data protection compliance.

Other than described above, HIAL will never pass personal information 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?

Information relating to car parking is retained for 6 months from the date that the service is concluded, which will usually be the date that you leave our car park, or cancel any booking that you have made.

3. Enews and Marketing

Why are We Collecting Your Information?

If you sign up for our enews, HIAL collects personal information to allow us to provide you with information about goods and services that may be of interest to you. This information is sent by email.

What Information is Collected?

For the purposes of our enews, we collect email address and name. We also ask you to indicate whether any particular geographic areas are of interest to you, which is to help us make sure we only send relevant information to you. Gender, age, and reason for travel are also asked so that we can improve our customer service based on our customer profile. You must provide your email address and name to receive our enews, but none of the additional information is required to sign up.

How will my information be used?

If you subscribe to our enews, we will use your personal information to:

- provide you with information about products and services we offer
- give you opportunities to participate in any promotional events such as competitions

We may occasionally also use your information for market research purposes and where we do so, we may pass your information to a third party to conduct this research on our behalf.

Lawful Basis

Processing personal information under data protection laws requires a lawful basis and where we collect personal information for the purposes of marketing, we will always ask for your consent before sending you any information. You may withdraw this consent at any time.

International Transfer

Some information collected through the HIAL website is transferred internationally and is safeguarded by the Privacy Shield scheme. Any organisation processing personal information on HIAL's behalf is subject to a data processing agreement that has specific requirements relating to transfers, and must ensure adequate safeguarding arrangements are in place.

Will my information be passed to anyone else?

HIAL uses data processors to process personal data on our behalf, including those providing web-based services. HIAL may also use third parties to deliver certain marketing services on our behalf, for example, the management of competitions.

What happens when my information is no longer required?

You may unsubscribe from our enews or withdraw your consent at any time; you can also update your preferences at any time.

Where you withdraw your consent, we will remove you from our database with immediate effect. Please note that, in some cases, we may retain your email address for maintaining a suppression list, which will ensure that you don't receive any information you have asked us not to send.

4. Providing Feedback and Making a Complaint

Why are We Collecting Your Information?

HIAL values all customer and service user feedback. Our feedback form provides a way in which you are able to provide feedback about any aspect of our operations or make a complaint.

What Information is Collected?

The information collected includes your name, e-mail, reason for contacting us, whether you would like a response and a free text box for you to send us a message. We need to gather this information to make sure your message is directed to the correct department within HIAL and responded to appropriately.

How will my information be used?

The way in which your information is used will depend upon the topic of your feedback. Submissions are sent to the appropriate person within HIAL, who will then respond to you if required.

Lawful Basis

When you complete and submit a feedback form, you are providing consent for us to process the information you have provided for the purposes of dealing with your enquiry. In order to place a cookie in your browser, we require consent which we ask for when you arrive at our site.

International Transfer

Some information collected through the HIAL website is transferred internationally and is safeguarded by the Privacy Shield scheme. Any organisation processing personal information on HIAL's behalf is subject to a data processing agreement that has specific requirements relating to transfers, and must ensure adequate safeguarding arrangements are in place.

Will my information be passed to anyone else?

Your submission will be passed to the relevant department within HIAL to be processed. HIAL uses data processors to process personal data on our behalf, including those providing web-based services.

What happens when my information is no longer required?

Information submitted to HIAL will be retained in accordance with HIAL's retention schedules, and will depend upon why the submission was made in the first instance. General feedback made via the website will be retained in an anonymised format wherever possible.

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 enews, please contact communications@hial.co.uk