

## Privacy Notice – Security Passes for Employees, Third Parties and Contractors

### 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 provides information to HIAL employees and those applying for positions at HIAL about how we process information for security pass purposes.

This notice also deals with information that we may process about people who are not employed directly by HIAL although may be employed by a third party or be contracted to work at one or more of the HIAL airports.

Please note that there are separate privacy notices that explain how we process information collected by our CCTV systems and for procurement and contracts.

### Why are We Collecting Your Information?

Your information is being collected for the purposes of managing and administering the contract that requires you or your company representatives to work at HIAL. This may be for a range of different services, concessions or other types of contract such as those relating to property, maintenance and construction. For those working at airports, identity and/or criminal record checks will be required if you are working in an area that is not accessible to the public, in any capacity where you are not accompanied by a HIAL member of staff. HIAL is legally required to process personal information for this purpose and is controller under data protection laws.

### What Information is Collected?

The information we collect about you is required to allow HIAL to perform the necessary security checks and allow you to work at a HIAL airport. We will only collect the minimum amount of information from you, and only where we require it.

Depending upon where you are working in the airport and where not already collected from your employer, we will ask you for:

- Name
- Employer/capacity in which you are working at the airport

For most posts, those working at airport premises will require a security pass. If you require a pass, we will require you to provide valid identification, which is likely to be either:

- Driving licence
- Passport

For some pass applications, we also need to verify employment and education details. This will require references for the previous 5 years, and training certificates such as GSAT or equivalent. You may also be asked for other personal information where it is necessary for our security checks such as date of birth and national insurance number. The full list of information required is detailed on the form that you will need to complete for your pass, and we will only ask for information that is needed.

You may be required to complete a form for a Disclosure Scotland criminal record check and an accreditation check. Some roles may also require a Counter Terrorist Check and your personal information will be passed to the appropriate authorities for this to be carried out. You should check with HR (for posts employed by HIAL), your employer (for those not employed by HIAL), as to whether this applies to your role as it will be specified in the contract.

The type of security background check required is a legal obligation laid down by the UK Single Consolidated Direction (Aviation) 2021 (SCD No. 2/2021). 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.

Information relating to pass holders is shared with the Home Office to assist with UK as well as airport security and is shared using legitimate interests where the interest is in maintaining appropriate levels of security.

If you are responsible for bringing a vehicle on to one or more of the HIAL sites, we may require registration and insurance details for the vehicle that will be used.

In some instances, we may require you to undertake training and will retain records of that training.

Where you are working for HIAL as a temporary member of staff through a third party such as a recruitment agency, we may collect information about some aspects of your work such as the number of hours you work. It may also include feedback to your employer about aspects of your performance where appropriate for the role that you are in. This will be specified in the contract.

You should also be aware that, depending upon where you work, you may be captured on CCTV that is operational at most airports. There is a separate privacy notice about our CCTV available from <http://www.hial.co.uk/privacy-policy/>.

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

Where the contract is with your employer, some processing of your personal information will be processed to meet legal obligations placed on HIAL as explained above. Any other processing uses the lawful basis of legitimate interests. This is because both HIAL and your employer have a legitimate interest in your personal information being processed for the purposes stated above and ensuring HIAL is able to adequately and appropriately maintain safety and security.

Where any contract or agreement is with you in a personal capacity, for example, as an individual or sole trader, the same legal obligations will apply. Additionally, HIAL will be processing your personal information for the performance of that contract.

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

For those that are working with HIAL under a service or works contract, there will usually be a contract manager who will co-ordinate any administration required to manage the contract.

Information relating to security passes is processed by dedicated teams within HIAL. This may involve the local team at the airport at which you are working as well as the central team at HIAL. As stated above, depending upon the level of security background check required, we may send your information to other organisations to conduct these checks such as to Disclosure Scotland and will send information relating to all security pass holders to the Home Office.

If specified as part of the contract, some information about your performance may be passed to your employer. If you require any further information about what this may include, you should check with the contract manager.

If you are contracting with us in a personal capacity, you should also see our privacy notice for Procurements and Contracts as some data relating to the contract will be processed by data processors. 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.

Under certain circumstances, we will share your personal data with professional advisers including lawyers, bankers, auditors, and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us. We may also pass your information to law enforcement agencies and other bodies where the information can be lawfully transferred.

HIAL has a contracted service for the provision of a Data Protection Officer (DPO) and your information may be processed on HIAL's behalf 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 security passes is retained for no longer than 12 months from the date a pass is no longer required. If your security pass is refused, information relating to that refusal will be retained for 3 months from the date of refusal.

Information relating to vehicle checks is retained for 3 months from the date a pass is withdrawn or, if on a long-term contract, from the date the information is superseded.

Information relating to training is retained for 6 years from the date you last worked on a site.

Where you have contracted with us in an individual or personal capacity, certain contractual information will have different retention periods, which is documented in the Procurement and Contracts Privacy Notice.

### **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 can be contacted at [dpo@hial.co.uk](mailto:dpo@hial.co.uk). For matters relating to the delivery or works contract, please contact your contract manager in the first instance. HIAL employees should contact HR about their employment contract.