



# Data collection through our websites

## Privacy Notice – Data collection through our websites

### 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 document provides information about how your data is collected and used when accessing our websites.

### What information is collected?

The information we collect from you will depend upon how you wish to use the website. There are five sections in this privacy notice:

- [1. Visitors to HIAL websites](#)
- [2. Car park bookings](#)
- [3. Information for those who subscribe to receive our Enews / marketing](#)
- [4. Providing feedback or making a complaint](#)
- [5. Completing a PRM survey](#)
- [6. Completing a Customer survey](#)

### 1. Visitors to HIAL 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.

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

### **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.

Depending on the processing activity, our use of your personal data falls within different lawful grounds under the UK GDPR, for visitors to HIAL websites the lawful basis is 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.

#### 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.

### **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.

### **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**

### **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:

- Email address
- Company name if applicable
- Name
- Mobile number
- Address
- 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.

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

We process personal information collected to manage the services you have purchased through our website. The booking process collects payment information is obtained and processed by a third party.

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.

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.

### **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.

HIAL uses a third party to process payments made for car parking who gather and process payment information for their own purposes. Data processing agreements are place with all organisations that process personal information on HIAL's behalf.

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. Information for those who subscribe to receive our Enews / 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 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.

Processing personal information under data protection laws requires a lawful basis and where we collect personal information for the purposes of marketing. This processing falls within the definition of marketing and will therefore be subject to the Privacy and Electronic Communication Regulations (PECR) as well as data protection laws. We will always ask for your consent before sending you any information. You may withdraw this consent at any time.

### **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 do not receive any information you have asked us not to send.

## **4. Providing feedback or 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 recipient within HIAL, who will then respond to you if required.

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. Refer to the [‘Use of Cookies’](#) section of this privacy notice.

### **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.

## **5. Completing a PRM survey**

### **Why are We Collecting Your Information?**

To provide the opportunity to persons of reduced mobility (PRM) to assess the quality of the assistance provided.

### **What Information is Collected?**

Surveys are completed anonymously, the following information is collected.

- Age when travelling (multiple choice of age brackets)
- Date of travel
- The type of assistance required

- Option to provide information about disability or assistance needs
- How the flight was booked, and which airline
- If assistance was pre booked
- Feedback in relation to quality of assistance

**How will my information be used?**

To provide experience information from passengers to monitor the assistance service provided and help shape future accessibility of the passenger experience.

Processing personal information under data protection laws requires a lawful basis. HIAL is required to conduct PRM surveys, and there is a legal basis for collecting data to measure performance in relation to quality of assistance provided, to ensure compliance.

Occasionally, processing will be carried out in the legitimate interests of the controller, to monitor the assistance service.

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

Information will be collected for the purposes listed above and this will include external organisations (for example, regulators) where they carry out the purposes stated above.

**What happens when my information is no longer required?**

Survey results will be retained for two years after which the information is securely destroyed.

**6. Completing a Customer survey**

**Why are We Collecting Your Information?**

To provide the opportunity for customers to provide feedback of their experience of HIAL’s airports.

**What Information is Collected?**

Surveys are completed anonymously, the following information is collected.

- Age when travelling (multiple choice of age brackets)
- Home postcode
- Broad reasons and frequency of travel
- Feedback relating to experience of the airport you have travelled through

**How will my information be used?**

Your positive or negative experience of the airport(s) will contribute to future shaping and improvements of the services and facilities offered at HIAL’s airports. The information collected will contribute to our strategic objective to make our operations more efficient, resilient and effective.

Processing personal information under data protection laws requires a lawful basis. The minimal personal data collected when completing the survey is being processed in the legitimate interests of the controller.

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

Information will be collected for the purposes listed above and will be shared with an external contractor based within the UK to provide analysis and reporting.

**What happens when my information is no longer required?**

Survey results will be retained for two years after which the information is securely destroyed.

### **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](mailto: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/>