

AIRSPACE CHANGE PROGRAMME CONSULTATION - PRIVACY POLICY

Edinburgh Airport are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable privacy and data protection laws.

This privacy policy provides information about how we process personal information obtained in connection with phases 1 and 2 (2016 and 2017) of our consultation regarding the Airspace Change Programme ("**Consultation**") through letsgofurther.com ("**Website**") and/or supplied in paper format to the Consultation Coordinator, Edinburgh Airport at PO Box 17473, Edinburgh, EH12 1ND, in response to our Consultation Documents.

By responding to the Consultation, you agree to your personal information being used and disclosed in the manner set out in this policy.

Personal information that we collect via the Website or Postal Responses

When you use the Website, as is the case with most websites, certain limited information (such as your browser type and IP address) will be collected by us automatically.

We will also collect and store personal information about you to enable you to participate in the Consultation and to enable us to process and analyse the responses. This will include your name and postcode. If you opt to be kept up to date by e-mail this will also include your e-mail address and if you opt to be kept up to date by post this will also include your postal address.

You may provide us with information about others, for example if you are a representative of your local council. You must ensure that they are happy and have agreed to you providing us with their information.

How we use personal information

We use the personal information collected from Consultation participants for a number of purposes, including to:

1. map and analyse for the purposes of the Consultation the areas from which responses have been received (using postcodes);
2. analyse all responses and use the information for the purposes of the Consultation including to develop viable route options and (in the second phase of the Consultation) to consult on those route options;
3. report to the Civil Aviation Authority (and other applicable regulators) on the results of the Consultation;
4. report to the Consultation Institute, who will assist us with interpreting and analysing the Consultation responses;
5. provide participants with updates on the Consultation if they choose to receive them, including by way of notification of updates to a set of Consultation FAQs updated on a regular basis; and
6. transfer to any entity which may acquire rights in Edinburgh Airport.

Postcodes will be used to allow us to map and analyse for the purposes of the Consultation the areas from which responses have been received.

Where we have obtained permission to provide you with updates sent to your e-mail address or postal address (e.g. by tick boxes) we will use your name and e-mail address or postal address for that purpose.

We will only use your information in accordance with this Policy, or where it is required and authorised by law.

We do not provide any personal information to an unrelated third party unless we have your permission to do so (including as set out in this policy) or where we are required to do so by applicable law (See **Providing information to others** below). Any further correspondence (if any) that you may receive from them will not be governed by this policy.

Communications from us

Where you have indicated you would like to receive updates we may send communications in the form of email or postal updates to tell you about developments in the Consultation. Please notify us of any changes to your personal information which you have provided to us if you wish to continue to receive updates.

You can unsubscribe from receiving updates by following the "unsubscribe" instructions included in our communications.

Providing information to others

For the purpose of this consultation, we will be working closely and sharing personal information with:

1. the Civil Aviation Authority;
2. our air traffic control service provider and other professional consultants; and
3. the Consultation Institute, who we will be using to assist with interpreting and analysing the data received in response to the Consultation.

The other third parties with whom we may need to share personal information to help us run the Consultation include:

- our owner, (see **Working with other service providers and group companies** below);
- third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services (see **Working with other service providers and group companies**); and
- law enforcement bodies in order to comply with any legal obligation or court order and, where we are otherwise requested to provide information, we may provide it but only in accordance with applicable privacy and data protection laws.

You agree that we may disclose or share your personal information with such partners in order that we may operate the Website and organise the Consultation. We will only share information with such organisations in accordance with this Policy, or where we believe it is necessary for a legitimate reason connected with the Consultation.

Working with other service providers and our group companies

For operational reasons, we transfer personal information to service providers and our owner who help us manage our systems and processes. These parties may be located in the UK, other countries in the European Economic Area or elsewhere in the world. Different privacy laws may apply in these countries and you understand and unambiguously consent to the transfer of personal information to these countries and parties.

We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that personal information handled in other countries will receive at least the same level of protection as it is given in your home country. In the event your personal information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions but we will only do so where required by applicable laws.

Keeping information secure

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Keeping your records

We keep records for as long as required to operate the Website and run the Consultation in accordance with legal and regulatory requirements. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

Cookies

Our website uses cookies (which includes third party cookies) to support analytics functionality.

Cookies are small computer files which are downloaded onto your device and collect information about the way in which you navigate and use our website and the Internet. Cookies do not collect information that allows us to identify individuals (e.g. names). The information provided by cookies helps us to provide you with a more personal experience and allows us to make improvements to our Website over time. You may delete and block all cookies or decide to just block certain types of cookie via your browser setting. However, if you choose to block or delete cookies, this may affect the functionality of the Website.

To find out more about cookies, visit www.aboutcookies.org and our Cookies Policy accessible at <http://www.edinburghairport.com/help/policies/privacy-notice#Privacyandcookies>.

Analytics

We use analytics tools on our website to identify service issues and to help us improve our Website.

These tools may be provided by third-party service providers and may include the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our Website. We may disclose data (not including personal information) to certain such third-party services providers in order to obtain such services.

You may request further details on other tools and third parties from us.

Access rights

You have the right to request copies of certain of your personal information within our custody and control and details of how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected. You also have a right, in certain circumstances, to require us to stop processing your personal information.

In relation to all of these rights, please email or write to us at the address below. Please note that we may, where permitted under applicable law, charge a small administrative fee and / or request proof of identity. We will respond to your requests within all applicable timeframes.

In certain circumstances (for example where required or permitted by law) we might not be able to provide you with access to some of your personal information, but where appropriate we will notify you of the reasons for this.

Complaints Process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint.

Third party sites

This policy only applies to the Website. If you land on our Website from other websites (including <http://www.edinburghairport.com/>) or move to other sites from our Website you should read the separate privacy policies.

Updates

Version 1.3 (Consultations 1 and 2): 24 April 2018. We will keep this policy under review and may place updates on the Website from time to time. Please review the Website periodically for changes. If you do not accept the amended policy, please stop using the Website.

Contact

If you have any questions about this policy, or would like to exercise your rights with respect to your personal information, please contact us at DPO@edinburghairport.com.