

NSL Privacy Notice

Protecting your personal information is very important to NSL Limited. The way we collect and share your information is just as important. You expect us to manage your information privately and securely.

Our Privacy Notice (the “Notice”) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us and properly safeguarded in a manner consistent with your rights and our obligations under applicable laws and regulations relating to privacy and the protection of personal data.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1. Information about us

1.1 In accordance with the General Data Protection Regulations 2016 (“GDPR”), NSL Limited is registered with the Information Commissioner’s Office (“ICO”) as the data controller under registration no Z9798193.

Our Site <http://www.nsl.co.uk/privacy-policy/> is operated by NSL Limited, a limited company registered in England under company number 06033060, whose registered address is Rutland House, 8th Floor, 148 Edmund Street, Birmingham B3 2JR

2. What this policy covers

This Privacy Policy applies only to your use of our Site and to the personal data that we collect from and/or about you. It does not extend to any other websites that are linked to or from our Site (whether we provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them

3. Information we may collect from/about you

We may collect your personal information through various means, including via our Site (through email or other electronic correspondence, by telephone, by direct contact, or if you voluntarily submit it, and where we are required by law to collect personal data).

3.1 Please see section 16 on our use of Cookies and our Cookie Policy <https://marstonholdings.co.uk/cookie-policy/>

3.2 Some or all of the following data may be collected about you:

- Name;
- Date of birth;
- Gender;
- Business/company name;

- Job title;
- Profession;
- Visual and audio images of you through our use of Body Worn Video and audio recording equipment;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as postcode and preferences;
- Financial information such as credit / debit card numbers;
- Personal data collected arising out of the debt collection and enforcement process (some of which may include sensitive data related to the customer or other third parties), such as information on the physical or mental health or condition of the debtor and details of incidents occurring during debt enforcement visits;
- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected);
- A list of URLs starting with a referring site, your activity on our Site, and the site you exit to (automatically collected);
- LinkedIn™, Facebook™ or Twitter™ profile names;
- Caller line identification;
- Complainants and other individuals in relation to a judicial service complaint or enquiry;
- People who use our services, e.g. who subscribe to our newsletter or request a publication from us;
- Information that you provide as a job applicant through our online job application facility, e.g. name and contact details, curriculum vitae, covering letter, references, equality monitoring information;
- Vehicle registration keeper details; and
- Banking details that you have permitted us to use on your behalf.

4. Sensitive personal data

4.1 GDPR defines certain personal data as 'sensitive' such as personal data regarding your ethnic origin, physical health and mental health. We are required to understand whether the people that we deal with could be regarded as vulnerable and this may involve collecting and using sensitive personal data. We may, for debt collection purposes, therefore ask you for some sensitive details or you may voluntarily give such personal data to us. We will only use this personal data for debt collection purposes and we will obtain your consent to process this data. We may share any of your sensitive personal data with our client to ensure your case is managed appropriately and other members of the Marston Group for debt collection purposes only. Any sharing of your sensitive personal data with clients will be on the basis of your explicit consent or if we are required or permitted to do so under the General Data Protection Regulations 2016.

5. How we use this information

5.1 All personal information is stored securely in accordance with the principles of the General Data Protection Regulations 2016. For more details on security, see section 14.

5.2 We use your personal data to provide the best possible services to you, in our legitimate interests and to fulfil our legal obligations as set out in detail below. This includes:

- providing and managing your access to our Site;
- personalising and tailoring your experience on our Site according to your interests or to make it more user friendly;
- supplying our services to you on behalf of our clients;
- personalising and tailoring our services for you;
- responding to communications from you, including any complaints;
- enabling payments to be made by debtors on behalf of our clients;
- sharing information about incidents occurring at the doorstep to protect the health and safety of the individuals involved with debt enforcement visits; and
- collecting information (where appropriate) on the vulnerability of individual customers who we are collecting or enforcing debts against, to ensure that they are treated fairly.
- Where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone and/or post with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the General Data Protection Regulations 2016 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
- Calling our Contact Centre helpline may result in our collection of Calling Line Identification information. Calls are recorded for training purposes and for the analysis and management of internal staff performance. Call recordings may be reviewed also as part of a complaint investigation. The use of this information assists with the improvement of our efficiency and effectiveness.

6. On what legal basis will we process your information?

We will always process your personal information on lawful grounds and in particular on the grounds set out below: –

6.1 Legal and Statutory Obligation

We may use or disclose your personal data to perform a legal and statutory obligation.

For example, enforcement of criminal or civil court orders. This information is likely to include your name, contact details, payment details, and details of the court order.

We may also be required to disclose your personal data by a law enforcement or taxation agency for the purposes of preventing crime.

6.2 Performance of a Contract/Service

We will use your personal information to allow us to provide services you or your organisation have ordered, or to enter into a contract with you.

This information is likely to include your name, contact details and payment details, information about your business and needs and any additional information we may need to help meet your specific requirements.

If you do not provide us with the information set out in this paragraph, then we may not be able to provide you with the products and/or services you have ordered/requested.

For example, we process recruitment data to decide whether to offer an employment contract.

6.3 Legitimate Interest

We will process personal information where we have a legitimate interest for example, we may collect body worn video footage to protect the health and safety of our staff or contractors.

We may use your data for marketing purposes which may include contacting you by email, telephone and/or post with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the General Data Protection Regulations 2016 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015 ▪ You can ask us to stop doing so at any time.

We may share your email address with Google and/or Facebook (acting as data processors) for them to use on our behalf in connection with the creation of marketing and promotion for us.

They may use this to serve targeted advertising/content to you via their platform. You can control what advertisements you receive via the privacy settings on the relevant platform.

Google and Facebook may also use socio-demographic information about you to identify other people like you, with similar interests to present our marketing to. This sociodemographic information is not used for any other purpose nor shared with any other party. No information about other individuals identified from these networks is shared with us at any time.

We may use some of your personal information for statistical purposes when we evaluate our range of services.

In the event that we buy or sell any business and/or assets we may disclose your personal data to the prospective buyer or seller of the business and/or assets. Please see 8 below.

The above activities are on the basis that they are in the legitimate interest of developing our business

6.4 Consent

We may ask for your explicit consent to collect and share your sensitive personal data as set out in section 4 above.

We may ask your consent to share your name and contact details with selected third parties so that they can tell you about their products and services.

If you agree, we may also pass on your information, in certain cases, for the purposes of conducting a credit check.

We will always ask you before we do this, and you can withdraw your consent at any time.

7. How and where information is stored and how long do we hold it for?

We only keep your personal data for as long as we need it for one of the lawful grounds set out in section 6 and/or for as long as we have your permission to keep it. For example our retention period for body worn video footage is 45 days.

We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner. If you have any questions in relation to our retention periods, please contact the data protection officer at Rutland House 8th Floor, 148 Edmund Street, Birmingham, B3 2JR.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("the EEA") to third party suppliers (the EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). We will only transfer your data to a recipient outside the EEA where we are permitted to by law (for example (A) where the transfer is based on standard data protection clauses adopted or approved by the European Commission, (B) where the transfer is to a territory that is deemed adequate by the European Commission, or (C) where the recipient is subject to an approved certification mechanism and the personal data is subject to appropriate safeguards, etc)

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Site.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us via the internet.

8. Disclosure of your information

We may share your data with other companies in our Group. This includes our holding company and its subsidiaries.

We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, correspondence management and mailing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may also disclose your personal information to third parties in the event that we expand or reduce all or part of our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If NSL Limited or substantially all of its assets are acquired by a third party, personal data held by it about its customers and website users will be one of the transferred assets and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by us.

We may compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any

personally identifying information. We may, from time to time, share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, for compliance purposes, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental, investigative or taxation authority. We do not require any further consent from you in order to share your data in such circumstances and will comply, as required, with any legally binding request that is made of us.

We may share your data in pursuing an interest that corresponds with a general public interest or a third party's legitimate interest. This may include situations where we are required to go beyond its specific legal obligations set in laws and regulations to assist law enforcement or private stakeholders in their efforts to combat illegal activities, such as money laundering, fraud prevention or misuse of services. However, the use of personal data in such circumstances will be restricted to data which is relevant to our services and necessary to identify you.

9. Complaints

When we investigate a complaint, we may need to share personal information with the organisation you have an outstanding debt with and with other relevant bodies (e.g. the Civil Enforcement Association or the Local Government Ombudsman to adjudicate on disputed complaints).

Upon receipt of a complaint, we open a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics showing information such as the number of complaints we receive, but not in a form which identifies anyone.

We are usually required to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we aim to respect that. However, it may not always be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. We do not usually identify any complainants unless the details have already been made public.

If you are not satisfied with the manner in which we have sought to redress your complaint, or if you wish to seek further advice with regard to the use of your data, you are within your right to contact the ICO for a further determination.

10. Controlling your personal information

When you submit information via our Site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us, which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service the Corporate Telephone Preference Service and the Mailing Preference Service. These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your right to withhold information

You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may restrict your internet browser's use of Cookies. For more information, see section 16 and our Cookie Policy <https://marstonholdings.co.uk/cookie-policy/>.

12. Your right to access information

You have the legal right to request details of any personal information we hold about you under the General Data Protection Regulations 2016.

There are some exemptions, which means you may not always receive all the personal information we hold, however where this is the case we will clearly explain it to you.

If you would like a copy of the information held on you, please write to us using the 'Contact Us' page.

It would help us to if you could address your letter to the Data Subject Access Request Team.

13. Ensuring the accuracy of your information

If you believe that any information we are holding on you is incorrect or incomplete, please contact us as soon as possible using the 'Contact Us' page. We will promptly correct or remove any information that is incorrect.

You have the right to settle or close your account and request that your personal information be removed from our website or other records. Upon the closure of your account we are not obliged to retain your information and may delete any or all of your account information without liability.

If you request a change of details and/ or account closure, we may retain residual information about you in our backup and/or archival copies of our database. This will be deleted in accordance with our data retention policy.

14. Protecting your information

We will use all reasonable efforts to safeguard your personal data. We have put in place strict physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

You should note that when using the Site and our related services, your information may travel through third party infrastructures that are not under our control. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We use high level encryption software to prevent access to your personal information. Unfortunately, the internet is never a completely secure environment. Therefore, we cannot guarantee that hackers or unauthorised personnel will not gain access to your personal information despite our best efforts.

We have put in place confidentiality clauses or confidentiality agreements (including data protection obligations) with our third party service providers.

15. Your rights

You have the right to ask us at any time:-

- to confirm whether we hold any of your personal data;
- to send you a copy of any personal data that we hold about you – see 12. 1 above;
- to correct any inaccuracies in your personal data and to add relevant details where the personal data we hold is incomplete;
- to delete (to the extent possible) any of your personal data, where we are required by law to do so;
- to stop or restrict processing your personal data, where we are required by law to do so;
- to let you have a portable copy of the personal data we hold about you, where we are required by law to do so;
- to stop processing any of your personal data that we process on the basis of our legitimate interests; and
- to stop sending you marketing material. However please note that we may continue to send you service related (i.e. non-marketing) communications, such as emails relating to the services we provide.
- Where we have reached a decision that affects you by processing your personal data automatically then you have the right to speak to someone to discuss that decision.
- We do not use your personal data for the purpose of profiling.
- Where we process your personal data on the basis that you have given us your consent to do so then you may contact us at any time to withdraw your consent

If you wish to exercise any of these rights or wish to object to our use of your personal information, please e-mail the data protection officer: dpo@marstonholdings.co.uk or write to us at the address given below.

Data Protection Officer

Rutland House 8th Floor,
148 Edmund Street,
Birmingham,
B3 2JR.

16. Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our services. By using our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than us. For more details, please refer to Our Cookie Policy: <https://marstonholdings.co.uk/cookiepolicy/>

17. Changes to our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations.

We recommend that you check this page regularly to keep up to date. This Policy was last updated in June 2019.

18. Who can I contact if I have queries about this privacy notice?

You can also contact us directly if you have any questions about our privacy notice or information we hold about you.

Please write to us at the address below.

Data Protection Officer

Rutland House 8th Floor,
148 Edmund Street,
Birmingham,
B3 2JR.

If you are dissatisfied with our handling of any complaint you also have the right to raise concerns with The UK Information Commissioner: <https://ico.org.uk>

© NSL Limited

Version 4.0

July 2019

Privacy Notice

Stansted Airport Limited

Overview / Introduction

At Manchester Airport Limited and Stansted Airport Limited, safeguarding your personal information and handling your information in a compliant way is important to us. We understand and respect the importance of guarding your privacy and are committed to protecting your personal information.

This privacy notice covers the way we handle your personal information that we receive from both from yourself and from our trusted third parties, what your rights are and our contact details if you need some additional information or wish to make a complaint.

It informs you about the types of information we collect, why we collect it, what we use it for, what your rights are, including consent, and how to contact us. If you require any further assistance or clarification, contact us or our Data Protection Officer. The contact details are provided at the end of this notice.

Personal Information

We collect your personal information to enable us to provide you with our goods and services. This includes, among others, information you provide when you use our websites and/or our services for:

Booking

Car park space – We collect information such as your name, email address, phone number, car registration and bank details. If you have already registered with us, we will only collect your email address and password for us to retrieve your information. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card detail as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Lounges (Escape and 1903) – We collect personal information such as your name, email address, contact number, flight details, reason for travel and payment details. If you have already registered with us, we will only collect your email address and password for us to retrieve your information. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Fast Track Security and Passport Control – We collect personal information such as your name, email address, flight details, reason for travel and payment details. If you have already registered with us, we will only collect your email address and password for us to retrieve your information. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Hotel - We collect personal information such as your name, email address, and payment details. If you select 'Text Message Confirmation', we will collect your mobile phone number. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Holiday & Flights – We collect information such as your name, date of birth, company name, full address, telephone numbers, and payment details. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Transfers - We collect personal information such as your name, email address, phone number and payment details. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

We will use your contact details to email you to seek your views on your experience as part of our guest experience program.

Purchase Vouchers

We collect information such as your name, date of birth, company name, full address, telephone numbers, and payment details. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We do not store your full payment card details as your payment is processed by our trusted third-party payment processor via a secure encrypted link. We will retain your information for four years after which your information will be deleted.

Purchase Travel Money

Our travel money site is run by our third party, Moneycorp. We do not currently share any customer data with them, nor do they share any customer data with us. We receive weekly sales data and sales by currency data on request. Please [click here](#) for information on how Moneycorp handles your personal information.

Reserve an Item in the Online Shop

We collect personal information such as your name, email address, contact number, and flight details. This information will help us to correctly identify you, use your information to supply you with the products and service and keep records about your purchases. We will retain your information for four years after which your information will be deleted.

Job Search

Creating a New Account - We collect personal information such as your name, email address, and country of residence. This information will help us to set up an account for you and correctly identify you for you to gain access to our recruitment site.

Once access is gained, we collect information such as your education history, language spoken, geographic mobility, and your cv. This information will be used to create a candidate profile for you.

Job Application – We collect information such as information already provided when creating a new account and creating a profile. We also collect sensitive data such as your eligibility to work in the United Kingdom, age bracket, ethnic group and information on your disabilities, if any. Information on eligibility to work in the UK is used to determine whether you can work legally in the UK and information about your age, ethnicity and disability is used to track and satisfy our legal obligation to include and employ a diversified workforce.

We will retain your information for six months if you're unsuccessful, and seven years after employment ends, after which your information will be deleted. Alternatively, you can click on 'Delete Profile' on the top right bar on the profile page of our job search website. This action will permanently delete the information we hold about you relating to your job search.

Use of Noise Complaint Form

We collect information such as your full name, contact details including telephone number and full address, date and time of event relating to the complaint, the type of complaint and description of complaint. The information you provide will help us to correctly investigate your complaint and depending on whether you agreed on receiving a response, we will or will not send a response to you. We will retain your details on our records for two years after which we will then dispose of them.

Feedback Form

We collect information such as your full name, email address, contact number, the type of feedback, terminal, the area within the airport which the feedback corresponds and relates to, your comments, date and time of incident, flight number (if known), and a booking reference, if feedback is related to Car Parking, Lounges or Fast Track. The information you provide will help us to correctly identify you and investigate any queries. It will also help us better understand your feedback. We may also share your personal information with third parties to further investigate your feedback. We will retain your details on our records for three years after which we will delete your information.

Request to Receive Flight Updates

When you request to receive updates on incoming and outgoing flights, we will collect your email address so that we can use it to provide the information as requested. We do not retain your personal information and will delete your email address as soon as the request is completed.

Exercise your Data Protection Rights

When you want to exercise your rights under GDPR, we may collect personally identifiable information for us to correctly identify you and respond to you. You would fill your personal information in a form and the information which you provide will be retained for a maximum of two years.

General use of our Websites and Services

We will collect statistics about your use of our services, such as what sections of the website you visit and when you arrive at the airport to check-in at meet & greet. We may also collect information about how our website and services are performing. For example, each time you use our website we may automatically collect the following information:

technical information, including the type of mobile device you use, a unique device identifier, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting

details of your use of our website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.

Getting in contact

We will also collect information about you if you take part in any of our passenger surveys or competitions, sign-up for our newsletter, or otherwise get in touch with us.

Building a profile

Where you provide your email address we will be able to link any information you provide us with and other information we collect about you to help us build a profile about you and your interests.

We will use this profile to help improve our services and to keep you informed about exciting promotions, news, features and activities that we think would be of interest, and we will use your information to make sure we deliver this information to you at the best time, such as when you arrive at the airport.

We aim to create a tailored and personal experience for you to be able to self-manage your preferences and how we get in touch with marketing material. To help us with this, in every marketing email we send you can click on a link to provide us with further information about you and your preferences. All this information becomes part of your profile.

We also use CCTV at our airports for security reasons and to manage our airports, for example, CCTV footage helps us to monitor queues at our airports. We may share CCTV footage with airlines that operate in the airports for security and monitoring of services and with law enforcement bodies.

WiFi

The free WiFi service in our airport is provided by Virgin Media. When you sign up to use the WiFi in our airports, your personal information is collected by Stansted Airport. We will use your personal information to market our relevant products and services to you.

Traffic enforcement

Parking Enforcement will be carried out by Stansted Airport to ensure that the road networks remain clear. If you park in a restricted area or tailgate out of a designated Stansted Airport car park without paying the correct charges, your car details will be collected by Stansted Airport and provided to our partner NSL. NSL then will use your personal information to issue you with a Parking Charge Notice.

CCTV Privacy Notice

Introduction

This privacy notice outlines what you should expect when Manchester Airport Limited t/a MAG (including but not limited to other businesses that are part of Manchester airport Group) collects personal data about you as you pass through any of our airport's areas. MAG is committed to not only protecting your personal data, but also provide a safe and secure experience whilst passing through our airports. We are legally obliged to use your data in line with all applicable laws concerning the protection of personal data, including the General Data Protection Regulation (GDPR).

What personal Data is being collected and processed and why we process this

When you enter our airport facilities or our land, we collect static or moving imagery via Close Circuit Television (CCTV) or surveillance systems. MAG collects imagery through the use of CCTV and or Automatic Number Plate Recognition (ANPR), these cameras are located throughout the airport grounds/ road networks both landside (public) and airside (restricted access areas) locations.

MAG use Body Camera's/ANPR/CCTV/Surveillance imagery and recordings for a number of purposes including but not limited to the following:

- MAG use CCTV/Surveillance imagery and recordings in the interest of public safety and for the prevention, detection and investigation of crime.
- CCTV/Surveillance imagery and recordings may also provide enforcements agencies with evidence of criminal activity, for formal actions including prosecutions in court and identification of offenders in investigations.
- These recordings may also be used to monitor flow and demand throughout the airport to optimise resourcing and passenger experience.
- To help support management of the airport operations and to assist in any incidents.
- To provide evidence of regulatory compliance to Departments for Transport (DfT) and Civil Aviation Authority (CAA).
- To respond to a subject access request.
- ANPR to identify a vehicles registration to match to a car park booking. Also used to monitor the entrance and exit times of a vehicle in our drop off facilities to calculate a price (based on the total time they have been in the drop off area)
- Body Camera's are used for protection of general public and MAG employees.

MAG's lawful justification for collecting and using CCTV/Surveillance imagery is that there are legitimate interests for doing so.

Third Parties

Some of MAG's CCTV and surveillance camera infrastructure is shared with authorised third-party organisations (as listed below). They use our camera infrastructure and use it for the purpose of crime prevention and detection activities. These arrangements are covered by data sharing agreements.

CCTV/Surveillance imagery is handled and used by the following recipients to maintain a safe, secure and efficient airport operation:

- Border Force (part of the Home Office)
- Manchester Airport Personnel
- Airlines
- Baggage systems operators
- Police/security services

How long will we keep your data?

As part of MAG's CCTV retention policy, CCTV/ANPR/Body Camera Footage is kept for 30 days after which point this is automatically deleted. Recordings or imagery that are being used for investigative or evidential purposes may be retained longer than MAG's retention policy. After the footage has been used for these purposes it is securely disposed of.

Imagery is stored in a secure environment and is only accessible by authorised personnel who have valid reasons to do so. All access to CCTV/Surveillance camera infrastructure is audited.

Your Rights

Under the General Data Protection Regulation and Data Protection Act, you will have the right to, where appropriate:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your Data
- Object to the processing of your Data

Please note these rights are subject to certain circumstances.

If you wish to exercise these rights, please contact Data Protection Officer via the following methods:

Email DPO@magairports.com

Data Protection Officer
Manchester Airports Group (MAG),
Olympic House,
3rd Floor,
Manchester Airport,
M90 1QX

Should you find that our response is unsatisfactory, you have a right to complain to the Information Commissioners Office (ICO) our supervisory authority, you can find more information on their website at www.ico.org.uk/concerns (Links to an external website).

This policy was last updated in November 2019 and will be reviewed again in November 2020