

## **Noise and Track System Privacy Policy**

The data controller is Edinburgh Airport Limited (referred to in this policy as “we” or “us” or “our”).

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. That’s why we’ve developed this privacy policy (“Policy”), which:

- sets out the types of personal data that we will collect
- explains how and why we collect and use your personal data
- explains when and why we will share personal data and with which other organisations
- explains the rights and choices you have when it comes to your personal data.

This Policy provides information about how we process personal information obtained in connection with complaints submitted through our Noise and Track system (NTK).

By submitting a complaint or enquiry for which you have requested a response 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 Noise and Track System, postal complaints or via our dedicated noise line**

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 us to respond to your enquiry or complaint and enable us to process and analyse trends in complaints received. This will include your name and your address, your postcode, your email address and if provided your telephone number. 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.

If you provide us with personal information about others, for example if you are a representative of your local council, you must ensure that those individuals have agreed to you providing us with their personal information.

### **How we use personal information**

We use the personal information collected from our NTK system for a number of purposes, including to:

- map and analyse data for the purposes of mapping the areas from which complaints have been received (using postcodes), analysing trends in complaints received over a period of time, providing data to assist us in noise management and mitigation
- respond to your enquiry or complaint.

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.

### **Why we collect and use your personal information**

In your complaint or enquiry, you have indicated that you would like a response from us. To do so we require your contact details, in addition if your complaint is in regard to noise or flights we require your address details to assist us in responding accurately and in detail.

We have a legal obligation under European Parliament and Council Directive for Assessment and Management of Environmental Noise 2002/49/EC, more commonly referred to as the Environmental

Noise Directive (END) and Environmental Noise (Scotland) Regulations 2006 to update our Noise Action Plan every 5 years.

### **Communications from us**

We will only respond to complaints and enquiries if you request a response, we will not send further communications to you unless they are requested.

### **Providing information to others**

Data from our NTK system including personal information will be used within the Communications department to analyse noise complaints, trends and form the basis of our policies on noise management and mitigation, however we will not share your personal information other than your postcode with other departments or outside agencies without your express permission unless under the following conditions:

- 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 and respond to your complaint or enquiry or to assist us in noise analysis, mitigation and management. We will only share information with such organisations in accordance with this Policy.

### **Working with other service providers and our group companies**

We will not supply your personal data to other service providers or our group companies.

### **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 or software system can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control. Information held on our computer systems and in our paper filing systems is secure to guard against unauthorised or unlawful processing or accidental loss, destruction of, or damage to personal data. We only authorise access to employees who need it to carry out their job responsibilities.

### **Keeping your records**

We keep records for as long as required to operate the NTK system and 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](http://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 and Other 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 some or all of your personal information and to erase it.

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. You may also contact the Information Commissioner's Office with any complaint.

### **Third party sites**

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

### **Updates**

We will keep this Policy under review and may place updates on the NTK 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 via [noise@edinburghairport.com](mailto:noise@edinburghairport.com) subject – Privacy Policy Queries.