

## ARTICLE 13 PRIVACY NOTICE

### Data Protection Act 2018/General Data Protection Regulations UK (GDPR UK)

#### EVENTS AT LONDON BIGGIN HILL AIRPORT - FILMING & PHOTOGRAPHY PRIVACY NOTICE

By entering an event at London Biggin Hill Airport, you are providing your consent for management, it's employees and agents to record your visual images, including but not limited to, photographs, digital images, voices, sound or video recordings, audio clips, or accompanying written descriptions and without notifying such person, to use his or her name and such images.

Photographs and film/video images of people are considered to be personal data and are covered by data protection legislation (UK GDPR).

#### HOW WE OBTAIN YOUR PERSONAL INFORMATION AND WHY WE HAVE IT

London Biggin Hill Airport promote and sponsor a number of free and paid events, for the public and/or businesses throughout the year. We also mark commemorative events such as Remembrance Sunday by holding local memorial services, parades etc.

Photographs and film/video may be collected when you attend one of our events.

We may use photographs and film/video to: -

- Share news
- To accompany press releases for publication in national, local press and associated media outlets
- For television and/or radio coverage
- To use on display materials/banners/posters/promotional films/promotional material – both in print and online
- To use on London Biggin Hill's websites [www.bigginhillairport.com](http://www.bigginhillairport.com) / [www.biggin-yourairport.co.uk](http://www.biggin-yourairport.co.uk) , Facebook, Twitter, Instagram, LinkedIn and other internet sites

#### LAWFUL BASIS FOR PROCESSING

Under the General Data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is: -

Consent – by entering one of our events you are providing consent to the processing of the above data.

#### WAYS IN WHICH TO WITHDRAW YOUR CONSENT

- Signage will be present at each event when processing is taking place and the event organiser's name will be present on the signage. Upon entering the event, please ask to speak to the event organiser and advise them of your wish not to be photographed or filmed.
- Choosing to stand out of shot
- Choosing not to attend the event
- Asking the photographer not to include you
- When relevant, wearing the offered indicator that you do not want to appear in photos and/or be filmed

**Please note that you still have the option to withdraw your consent after the event, up to the point of publication. Once your data has been used it would be of disproportionate effort to recover said material.**

As consent has been given you can ask us to stop using your image(s) and or video/voice recordings at any time, in which case they will not be used in future publications but may continue to appear in publications already in circulation, including digital feeds.

Please note a separate consent form for children and young people under the age of 18 will be made available if required. Images of children and young people under the age of 18 require the consent of a parent or guardian and special care will be taken to ensure that the appropriate consent form is fully understood. Children and people between 12 and 18 years of age who have sufficient understanding of the consent process and its implications for them should be involved in completing the form and their consent should be sought. The child/young person may also sign the form.

### **HOW WE STORE YOUR PERSONAL INFORMATION AND HOW LONG WE RETAIN YOUR DATA**

London Biggin Hill Airport will download your data onto our secure UK based server. Backup data is stored within the UK on secure airport servers.

Your data will be retained for 15 years.

### **DATA SHARING & ACCESS TO YOUR DATA**

Where your data is shared through digital feeds such as on our website and/or through social media, the content can be shared by anyone after it is published. Please be aware that the contents can be viewed throughout the world and not just in the United Kingdom.

We may share your images with: -

- Press agencies – including PR agencies working on behalf of London Biggin Hill Airport
- Local and national media
- Specific organisations (when involved in the event, campaign or service initiative)
- Printing companies
- Third party companies involved with our events

Access to your data on our server will only be processed by London Biggin Hill employees who are involved in the running of the event.

### **YOUR DATA SUBJECT RIGHTS**

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com) or use the information supplied in the 'Contact Us', section below. To process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

Your rights for this particular processing are: -

Right to Access  
Right to rectification  
Right to erasure  
Right to restriction  
Right to data portability

Please see below a full list of data subject rights below but please remember that depending on the legal basis for processing they may not be absolute rights. If you require further information, please do not hesitate to contact us.

## **THE RIGHT TO BE INFORMED**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

## **THE RIGHT OF ACCESS**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to exceed one calendar month, where we require additional time or (extended by 2 calendar months), or, in the case of repetitive requests, we reserve the right to request payment (for reasonable administrative costs) before processing the request, we will inform you.<sup>1</sup>

## **THE RIGHT TO RECTIFICATION**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

## **THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

Due to the complex nature of Consent and legal exemption, we are not always able to fulfil deletion ("Right to be Forgotten") requests, and it is essential you understand this before accessing the service.

## **THE RIGHT TO RESTRICT PROCESSING**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of personal data is contested.
- b) Processing of personal data is unlawful.
- c) We no longer need personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised, and processing is restricted pending a decision on the status of the processing.

## **THE RIGHT TO DATA PORTABILITY**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of Consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

### **THE RIGHT TO OBJECT**

You have the right to object to our processing of your data where;

- a) Processing is based on legitimate interest;
- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

### **DATA SECURITY**

To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we have in place appropriate physical, electronic and managerial procedures to safeguard and ensure information supplied is held securely, in accordance with the Data Protection Act 2018 and the UK GDPR.

### **HOW TO COMPLAIN**

If you have any concerns about our use of your personal information, you can make a complaint to us at London Biggin Hill Airport

E-mail [datamanager@bigginhillairport.com](mailto:datamanager@bigginhillairport.com)

01959 578517

Information Governance Manager

Main Passenger Terminal

Hangar 2

Biggin Hill

Bromley

TN16 3BH

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Livechat via [ico.org.uk/livechat](https://ico.org.uk/livechat)

Helpline number: 0303 123 1113

ICO website: [www.ico.org.uk](https://www.ico.org.uk)