# What is GDPR?

On the 25th of May 2018, the new EU regulation on data protection known as General Data Protection Regulation (GDPR) will come into effect. This will demand higher levels on how we manage and protect your personal data, and it gives you better opportunities to have an influence on our data management.

# How does this affect me?

Summarily, GDPR means that you:

* Have the right to get more detailed information about how we process your personal data. We present that information in our Integrity Policy below.
* Gives an opportunity, under certain circumstances, to demand that your personal data is being removed or that we limit the control of it.
* Creates better opportunities to receive information on your personal data, and under certain circumstances, get them edited or deleted.
* Can accept or contravene special processes done by us, such as direct marketing.

# Integrity Policy

It is important for us that you always feel safe with how we manage your personal data. You should feel sure of us using a correct and safe way of processing, and that we never use your personal data in a way that we are not allowed to.

According to the law of integrity, personal data can only be used for specific and certain purposes, and only if processed on a legal basis.

In this integrity policy we describe why we process your personal data, what personal data we process, what legal basis our process is based on, and also for how long we keep the information saved. We also present information on how you can influence the processing by using your legal rights. You can also find information on who to speak to among our staff regarding questions about personal data processing, and where to reach out if you are not satisfied with our handling of this.

Örebro Airport has the responsibility of the personal data for the process we are in charge of.

It is important that you read and understand the integrity policy. You are always welcome to contact us if you have any questions or concerns.

# What is personal data?

Personal data is data that we can use to directly or indirectly identify you. Examples of this could be your name, your personal, your date of birth, or your phone number. When visiting us, and sending mail or e-mail to our accounts there are recordings being made that saves personal data which we can connect to you. Even data that is being generated in our check-in system is personal data that we can use to identify you.

# What is a process of personal data?

Everything we do with your personal data is being done on a legal basis according to the applicable regulations, this is being applied no matter if we use automatic systems or not. Examples of regular processing could be collecting, registering, organizing, structuring, storing, working, transferring, and cancelling. To only read personal data is also a sort of processing, this could be done when you are calling us for support.

# What personal data are we processing?

The personal data that we are collecting is about you who are a traveler, customer, or partner of Örebro Airport.

Örebro Airport is a protected property and therefore we use camera surveillance.

**For you as a traveler,** this could be personal data such as your name and destination of travel. This information is only being stored in our system during a short space of time when you are travelling. On the occasion that your luggage goes missing, we receive information such as your name and contact details, this will help us to get the luggage back to you as soon as possible.

**For you as a customer,** this could be personal data such as name, address, e-mail. We use this information in order to inform you about our organization.

**For you as a partner,** it is the details in the contracts we have agreed on, as well as information on how you pay the invoices. This information is also something that you provide us with.

**Camera Surveillance** is moving images of you that we use to secure that all departures from Örebro Airport are safe and no criminal actions are involved.

# **What is the information used for?**

In order to be allowed to process your personal details, we are required to have indicated a definite and justified purpose with the processing. The personal details cannot be processed in any different way or form to the original stated purpose. In addition to this, we are required to have law endorsement, also called legal basis, to be able allowed to process personal details.

The processes of personal details that we are executing are supported by the following legal basis:

1. The processing is necessary in order to **protect the interests that are of essential importance** for the registered-, or any other physical person. We keep your personal data to make your travelling safe.
2. The processing is necessary to **enter into or complete an agreement** with you. As an example, this could be collecting information about you in order to secure that all the requirements of our agreement is being met.
3. The processing of your personal details is necessary in order for us to **complete a legal obligation**. As an example, this could be to save personal data for accounting purposes.
4. We are evaluating, after a so called **”balancing of interests”,** that our interest of processing your personal data is more important than your right to integrity protection. As an example, this could happen when we process your personal data for direct marketing.
5. You have given your expressed approval for the processing, for example when we process your information for marketing purposes. In some cases, we ask for your approval for a specific project before it begins. In other cases, we ask for your general approval on reoccurring processing. You have the option to recall your approval at any time. An important note to this is that if you recall your approval, we might not be able to provide your services in the same way as it has been done before.

In order for us to provide our services to you, we need to handle and process your personal data. Below follows examples of different purposes to why we process your personal data and on what legal basis it is done.

# **For you as a traveler**

We process your personal data to the extent that we need in order to maintain flight security and be able to support you if a problem arises during your travels.

*Legal basis: Protect your interests that are of fundamental importance.*

# **For you as a customer**

We need to process your personal data to be able to send you the invoice according to the contract, and also to move debt collection forward and ensuring that our claim is being paid. Also, we process your personal data in order for us to utilize our rights and implement our obligations according to the agreement with you.

*Legal basis: Compliance of contract and expressed interest.*

Örebro Airport´s authorized interest for this process is to ensure that we acquire payment according to the contract agreement with you.

# **Communication**

We process your personal data in relation to other communication with you, for example we do this to provide you with information about changes in our organization and services to make it work as good as possible. When contacting us, we use personal data of yours to be able to support and take your aspects in consideration. We also process the personal data that we receive from you when, or if, you have filled out a survey- and customer satisfaction questionnaire that is connected to us.

*Legal Basis: Compliance of contract and expressed interest.*

Örebro Airport´s authorized interest for the processing of personal data in survey-, and customer satisfaction questionnaire is that we want to obtain your opinion in order to improve our services.

# **Improvements of the organization**

We process personal data because we want to improve and develop our offers to you and other customers, as well as elaborating our internal processes and systems. For this purpose, we might also compile statistics for analytical needs.

*Legal basis: Expressed interest.*

We have multiple expressed interests for the processes mentioned. A systematical work to develop our services, products, internal processes and systems for the long-term supply of progress requirements towards our customers and the market. In a case where we need to use data for that purpose, we will separately request an agreement from you.

# **Marketing**

We process your personal details to be able to promote our services direct to you. To make that possible for us, we use your personal data (ex. e-mail) in order to present relevant offers for you and your needs. When we direct our marketing towards you, it is done via e-mail, social media, and our website. If you do not want to receive promotions, or don not want us to view your personal data for this purpose, you can simply inform us about this via e-mail or telephone. In order to better understand the needs of our customers, we might also compile statistics.

*Legal basis: Expressed interest*

Our justifying interests for the mentioned processes lies in our need to market new- or current services. We only send you information that we believe you will find interesting. We will never send information to you if you have said no to promoting messages.

# **Information security, mains-operated, and to prevent misuse of services**

We process your personal data in order for us to maintain acceptable service and security in our systems, and for us to provide you services. We also process your personal data to be able to discover and prevent criminal use of our services, or use that clash with the objectives you accepted when going into an agreement with us.

*Legal basis: Compliance of contract and legal obligation*

# **Camera surveillance**

Örebro Airport is a protected property. To maintain security and protect the aviation from illegal actions, parts of the area is under camera surveillance. This personal data is moving pictures that are being saved for a short time.

*Legal basis: protect interests that are of basic importance*

# **Compliance of laws**

We process your personal data to meet the legal requirements that lies on us, as an example the accounting law requirements for storage of accounting material. Örebro Airport also process personal data for the purpose of meeting the requirements for storage of data by the law of protection against terrorism. We also process personal data to be able to give out information to law enforcement forces, as well as SOS Alarm for emergency calls.

*Legal basis: Legal obligation.*

# **How do we collect the information?**

* We collect personal data when you are travelling from Örebro. The information comes from airlines, and in certain cases travel companies, or from you as a traveler via email or by word of mouth. We also analyze moving pictures when suspecting illegal actions.
* We collect personal data about you when you are contacting us by email or that our staff members notifies the information you have given to us in person.
* We collect personal data needed to maintain current contracts.
* We collect personal data when you choose to answer customer- and survey investigations, as well as when you are subscribing to our newsletter.
* We receive information through our websites use of cookies that collects data from your web browser.

# **For how long is the information stored?**

According to the privacy legislation, we are not allowed to save personal data about you longer than we need for the certain purpose we process it for. Therefore; we never store personal data for no reason, there is always a defined purpose for it that is supported by law.

Because the information that we collect, and the one that is being created when you use our services is processed for different purposes, they are also stored under various time frames. Therefore; personal data about you, are stored in one system, but was deleted in another one. Below follows descriptions of some main rules of how long we store personal data.

* **For you as a traveler** the data is only stored during ongoing flight, as long as no unforeseen action happens. When you have arrived at your destination, the information is deleted.
* **For you as a customer and partner** we store the personal data, unless we provides something else, as long as you are an interest part at Örebro Airport and for the 24 months past the contract expiration. When the agreement expires, we delete or anonymize the personal data in the systems being used to support the conditions of the contract. However, the personal data can be stored in other systems, such as the invoice system, because we need the information for a longer time there in order to meet the requirements for the accounting law.
* **Camera Surveillance** is being stored for different time frames depending on occurence.
* To be able to administrate, inform, and make market- and customer analyzis the data is being stored until you notify us that you do not want information anymore.
* The customer- and partner data that we save are because of the obligations according to the law or other statute, authority regulation, decisions or authority request, being saved for as long as the current requirement states.

# **For whom is the information available?**

In some situations, we share your personal data with others. Below we describe when and why we do this. We want to underline that we never share your personal data if it is not required for us to complete any of the processes presented above, which we have a purpose and legal basis for. We do not sell on your personal data to others.

# **Suppliers and other personal data assistants processing personal data for our accounts.**

We are hiring multiple different suppliers in order to maintain and develop our services, and give you adapted and relevant information. We have for an example, service engineers and assembling fitters that helps us with support for network, servers, and systems. Also, we have got retailers and suppliers with customer service that helps us with sales and customer relationships. Continuing, we are using partners both for distribution and invoicing, this in order to handle possible errors and to send out invoices.

When we are using suppliers that process personal data for our accounts, we always sign a personal data assistant contract with the supplier. These contracts states that the supplier (the personal data assistant) can only process personal data for purposes that we decide and on certain instructions from us. Because of this, our suppliers are not allowed to do anything with your personal data that we have expressed our agreement on and told them to complete. We are demanding the suppliers´ processing of personal data to be safe and correct.

# **Transfer to supplier in third country**

Sometimes we need to transfer your personal data to suppliers that have all, or parts of their business outside the EU/ESS, so called ”third country”. One reason for this are that some travels go to third countries. We do not hire any suppliers in third countries if the country have not got adequate security level, or that we have taken necessary security measures for the transferring according to the requirements of GDPR. We always make sure that the supplier goes into agreement with us where they commit to follow the obligations accepted by the EU commission regarding safety for personal integrity. If you want to read more about transfer to third country, there are good information on the website of [Datainspektionen (link)](https://www.datainspektionen.se/other-lang/in-english/).

# **Authorities and Emergency Services**

We disclose personal data to crime fighting authorities according to the law and authority, as well as to police and emergency services when calling to SOS Alarm.

# **Your rights**

You have the right to receive information about how we process your personal data. Such information is available in this integrity policy. If you have more questions and concerns regarding our processing of personal data, you are more than welcome to contact us.

In addition to your right to information, you have also got other rights in relation to your personal data. For example, you can influence our processing by requesting abstract, correction, deleting, and limitation. You have also got the right to object certain processes that we are executing, and also demand your personal data to be removed or transferred.

You can read more about each different right in the section below.

# **The right to access**

You have the right to get information, free of charge, about what personal data regarding you that we process (registration records). Because it is important that we do not disclose your personal data to someone else, a request of the registration records must be written and signed by yourself. Together with your request, a signed copy of valid identification document should follow.

When sending your request, it is good that you specifically indicate what information interests you. For example this could be contract agreements, notifications in e-mail, or similar. In that way we can provide you with the information most relevant to you.

If you send in more requests about registration records, we might take an administration fee for it. Would the abstract be comprehensive and it takes a long time, or that we for any reason cannot complete your request, we will inform you about this.

To request an abstract of the registration records, please send us a letter describing what information you are interested of, your name and personal data, your address, and a signed copy of identification document.

Please send your request to:

Örebro Airport  
Att. Dataskyddsombud  
Flygfältsvägen 10  
705 94 Örebro

# **The right to correction**

It is our responsibility to make sure that the personal data that we and our distributors’ process are correct and relevant. Because of this, we treat our registers systematically, update address details, and similar information about you to always have the correct data. If you notice that the information we have about you are false, or that we miss important information, you have the right to get the details corrected. We are thankful that you help us with this. Please contact us if you want your information updated.

Simple details can be corrected by us without any deliberation, but sometimes we may have to analyze your request to make sure that we agree on it. If we update your information on your request, we will inform possible distributors and partners that we disclose the information to about the corrections. We never do this if it is impossible or demands a huge effort to get it completed. If you require it, we will also inform you about who the correction has been handed over to.

# **The right to delete**

You have the right to demand personal data deleted in the following situations:

* If the personal data is not required anymore for the purposes they have been collected and processed for;
* If we process personal data with support of your approval and you recall it;
* If we process personal data for direct marketing and you oppose that the personal data continues to be processed for this purpose.
* If we process personal data after an interest consideration has taken place, and there is no authorized reason weighing up your interest;
* If we do not process personal data according to the effective regulations;
* If it requires all personal data to be deleted in order to fulfil the legal duties.

Because it is important that we do not delete the wrong person´s information, a request to delete should be done written and be signed by you. Together with your request we need your name, personal identity number, your address, and a signed copy of your valid ID document.

Please send your request to:

Örebro Airport  
Att. Dataskyddsombud  
Flygfältsvägen 10  
705 94 Örebro

When receiving your request, we analyze it to make sure that we agree on your personal data to be deleted, and we inform you about our decision. If we delete your information on your demands, we will inform possible distributors and partners that we disclose the information to about the delete. We never do this if it is impossible or demands a huge effort to get it completed.

# **The right to limitation of processing**

*Applies from the 25th of May 2018*  
You have got the right, in some cases, to demand a limitation of the processing of your personal data. With the limitation, it means that the personal data will be marked in order to for them to only be processed for certain defined purposes.

The right to limitation applies, for example, when you consider your personal data to be false and have requested a correction. In these cases, you can also request that our processing of your personal data is limited during the time of the data being investigated for correction.

Because it is important that we do not limit the processing of another person´s data, a request for limitation should be done in writing and be signed by you. Together with your request we need your name, personal identity number, your address, and a signed copy of your valid ID document.

Please send your request to:

Örebro Airport  
Att. Dataskyddsombud  
Flygfältsvägen 10  
705 94 Örebro

# **The right to objection**

You have the right to object to the processing of your personal data that we do with support of interest consideration. In that case, you will need to specify, in writing, which process you object against. In these cases, we are only allowed to continue with the process if we can prove that there are compulsory expressed reasons, weighing more than your interest, for the processing of the personal data.

If your personal data is processed for direct marketing, you have always got the right to, at any time, object to the process.

Because it is important that we do not limit the processing of another person´s data, a request for limitation should be done in writing and be signed by you. Together with your request we need your name, personal identity number, your address, and a signed copy of your valid ID document.

Please send your request to:

Örebro Airport  
Att. Dataskyddsombud  
Flygfältsvägen 10  
705 94 Örebro

# **The right to data portability**

*Apples from the 25th of May 2018*   
If you have given your personal data to us, you have, in certain cases, got the right to take out and collect your personal data. In order for you to use your right to data portability, your request must relate to information that you have provided us with and we are processing with support of your approval, or to meet the contract agreement with you. The right to data portability does not apply when our process of your personal data is based on interest consideration or a legal obligation.

Because it is important that we do not leave your personal data with someone else, a request for data portability should be done in writing and be signed by you. Together with your request we need a signed copy of your valid ID document.

To request a registration abstract, please send us a letter indicating what information you are interested in, your name and personal identity number, your address, and a signed copy of valid ID document.

Please send your request to: Örebro Airport  
Att. Dataskyddsombud  
Flygfältsvägen 10  
705 94 Örebro

# **Complaints**

If you consider that our processing is being done against the integrity safety regulations, you should report this to us as soon as possible. You can also express your claim directly to the inspectors of data.

# **Indemnity**

If you have suffered harm because of your personal data has been processed against the integrity safety regulations, you can have the right to indemnity. In these cases you can, after a written request, require an indemnity from us or to arouse claims for damages in court.

# **Cookies**

In order to get you the most relevant information and service when browsing on our and partners´ websites, information is collected through so called cookies. You can choose to accept or not accept cookies.

# **Personal data responsibility**

Örebro Airport is responsible for personal data and the personal data that is being processed within our organization. We decide for what purposes the process is happening and how it is completed. We also decide how personal data is processed when we use subcontractors.