

# Privacy Statement Eindhoven Airport N.V.

We respect the privacy of the visitors of our website. Therefore, we take care to keep your personal information safe, secure, and confidential. We adhere to the privacy rules of the General Data Protection Regulation (GDPR), as explained below.

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## We are the data controller

Eindhoven Airport N.V. (hereinafter: "Eindhoven Airport") is the data controller of the processing of your personal data via this website and for certain processes and activities that take place at the airport. We are located at Luchthavenweg 13 (5657 EA) in Eindhoven.

### Privacy Officer

We have appointed a Privacy Officer who is the first point of contact for questions regarding privacy. If you have questions or comments about our Privacy Statement or how Eindhoven Airport handles personal data, you can contact us at [privacy@eindhovenairport.nl](mailto:privacy@eindhovenairport.nl).

### Data Protection Officer

Our Privacy Officer reports to the Data Protection Officer (hereinafter: "DPO") of the Royal Schiphol Group. The DPO verifies whether personal data is being processed in accordance with the GDPR. Questions or request for the DPO can be sent to [privacy@eindhovenairport.nl](mailto:privacy@eindhovenairport.nl). We will forward those questions or requests to the DPO. As soon as possible after receipt of your request or question, the DPO will inform you about your question or the handling of your request.

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## Applicability

With this Privacy Statement, Eindhoven Airport wants to offer transparency on how Eindhoven Airport treats your personal data and for what purposes these data are used. This Privacy Statement applies to all processing of personal data by or on behalf of Eindhoven Airport and applies to the following persons:

- Visitors of this website;
- Persons that use products or services offered, whether or not by third parties, via the Eindhoven Airport website (e.g. parking);

- Persons that sign up to receive information from Eindhoven Airport (e.g. newsletters);
- Persons that provide us with feedback via our website or social media channels; and
- Passengers and other visitors of Eindhoven Airport.

### **We are not responsible for third-party processing**

This Privacy Statement does not apply to data processing by other organisations based at Eindhoven Airport, such as airlines, ground handlers, lessees, operators of shops and catering outlets at Eindhoven Airport, the Royal Netherlands Marechaussee and Customs. Eindhoven Airport has no access to this data processing by third parties or to the data involved, and is not the controller for it. We refer to the privacy statements of those organisations for more information on the way in which they treat personal data.

It is possible to click through to websites of other parties via the Eindhoven Airport website. Eindhoven Airport cannot accept responsibility for the treatment of personal data by those other parties. We advise you to carefully read the privacy policy of those other parties.

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## **Which personal data do we process and why?**

Prior to processing, Eindhoven Airport determines the purpose of the processing, which data we actually need and the legal basis on the grounds of which we process the data.

The purposes for and bases on which Eindhoven Airport processes personal data are:

### **A. To implement statutory regulations and tasks in the public interest**

There are a number of legal obligations that require personal details to be processed to comply with that obligation.

#### **Safeguarding security**

The safety of all visitors and Eindhoven Airport staff is paramount to us. Personal data that may be processed for that purpose include, for instance, camera images that are recorded in the terminal. The camera images are removed after 28 days, unless there are good reasons for storing the images for a longer period, for example for an investigation of an incident.

#### **Civil aviation security**

In performing its tasks as the operator of the civil airport, Eindhoven Airport processes personal data for civil aviation security purposes. Eindhoven Airport has outsourced the implementation of

preventative security checks on passengers and baggage to a security company. This is done in a number of ways as described below.

### **Access control**

Eindhoven Airport has to verify that access to the area behind the security checkpoints is only granted to passengers that depart the same day. For this purpose, Eindhoven Airport checks boarding pass data that are processed at the security checkpoints (Self Service Boarding Pass control). Those data are only processed, not stored.

Airport employees working in the area behind the security checkpoints, are granted access to that area only by the Eindhoven Airport Pass. The Eindhoven Airport Pass is one of the controls to prevent the risk of unauthorized access of persons and vehicles to the security areas. Eindhoven Airport has to comply with the relevant (inter)national (security) legislation in order to perform its tasks with regard to the security of civil aviation.

This processing of personal data is necessary for the registration and issuance of passes granting access to the protected and secured areas that are regulated by the access control system. Access control is carried out via controlled passageways in combination with a valid Eindhoven Airport Pass, in accordance with the requirements of Regulation (EC) No 300/2008, Annex 17 of the 'International standards and recommended practices' of the International Aviation Organisation (ICAO), section 3A, article 37a to i of the Luchtvaartwet (Dutch Aviation Act) and the National Civil Aviation Security Programme.

### **Access Pass**

All persons working at Eindhoven Airport must have an Eindhoven Airport Pass. With respect to the Eindhoven Airport Pass Eindhoven Airport processes the following personal data: name, address, date and place of birth, nationality, sex, photo, employee number (optional), name and contact details of the employer (address, email and telephone number). These personal data will be stored for a period of five (5) years after the moment that the Eindhoven Airport Pass has been returned, unless there are valid reasons for storing the personal data for a longer period, for example for an investigation of an incident.

You can make an appointment at Eindhoven Airport's Badge Centre (Bureau Toegangszaken). This appointment can be made via our website. In order to process and confirm the appointment, we ask you to provide the following information: your name, date of birth, email, telephone number and name of the employer.

## **B. Supply of service to customers and passengers**

### **Parking**

Eindhoven Airport uses personal data when performing parking agreements but also for matters directly related to parking agreements, such as complaints handling, customer service, parking space security and payment refunds. Depending on the parking product purchased, we may process the following data:

- Name and address details:  
First and last names/address (street name, house number, post code, town/city)/ email address/ telephone number/ date of birth
- Flight information and parking information:  
Arrival date/ arrival time/ departure date/ departure time/ flight number(s)
- Vehicle information:  
Vehicle registration number/ color, model, vehicle type (National Vehicle and Driving License Registration Authority)
- Financial information:  
Last four digits of credit card used/ payment ID/ name of account holder/ international account number (IBAN)/ bank identification code (BIC)/ VAT number
- Customer and transaction information:  
Reservation number/ selected parking product/ company name/ card number (subscription)/ entry date/ time/ employee number/ subscription type/ employer/ Eindhoven Airport Pass
- Other data:  
Camera images

The retention period for data processed for the performance of the parking agreement is set at two (2) years after the booking has been established. The camera images are removed after 28 days, unless there are good reasons for storing the images for a longer period, for example for an investigation of an incident.

### **PPR**

As per October 30<sup>th</sup> 2016, Eindhoven Airport is independently allocates (without intervention of Airport Coordination Netherlands) the available flight movements for General Aviation (GA) and Business Aviation (BA). GA/BA parties can create an account via our website to request PPRs (Prior Permission Requested/flight movement). The personal data that must be entered when creating the account are required to create an account, to log in to the account and to process PPR requests. The retention period for PPR applications is set at two (2) years after the end of the customer relationship.

### **WiFi network**

After explicitly agreeing to the terms and conditions, visitors of Eindhoven Airport may use the Wi-Fi network as a free or paid service. In order to activate this service, Eindhoven Airport processes the

MAC address of the device and/or the usernames and/or certificates used. In addition, for activating the paid service, Eindhoven Airport processes your name, email address, credit card number or PayPal username. If you make use of the free Wi-Fi network, your data are immediately deleted after the session is ended. If you make use of the paid network, your data are stored for the period of validity of the purchased Internet period (for example, 24 hours).

### **Marketing**

Eindhoven Airport processes data via its website about web surfing behavior. We collect anonymous user data through Google Analytics so that we can improve our services. For more information about the types of cookies used by us, please refer to the [Cookie Statement](#). If we process data for specific marketing purposes, we will ask customers for their consent. A maximum period of two (2) years applies to the storage of this data. We retain the data which demonstrates that customers have given their consent to receive marketing messages or emails in this regard for a period of five (5) years. Personal data used for financial purposes (e.g. invoices) is subject to a retention period of seven (7) years.

### **Product and service improvement**

Eindhoven Airport processes your personal data in order to improve our services and to keep you informed about the services and products you purchase or may purchase from us, as explained in further detail in this Privacy Statement, unless you have objected to this use of your data.

If you are a Eindhoven Airport customer, and you have given your consent for this, we combine information we obtain when you purchase one or more products or services from us, such as various parking products. We do this for administrative purposes and in order to gain a complete overview of the products and services you have purchased from Eindhoven Airport. In turn, this will allow us to provide you with better service if you contact us, and to offer you other products and services that may be personal relevant. The personal data used for product and service improvement is set at two (2) years after the end of the customer relationship.

### **Handling complaints**

We process your name, email address, telephone number and the description of the complaint or question if you submit a complaint or question by phone or via our online complaint form. Data relating to the handling of a complaint or question will be retained for two (2) years following the completion of the complaint or question.

## **C. Implementation and analysis of company processes and systems**

Eindhoven Airport processes personal data to optimise its business processes, such as the baggage process and the passenger process.

### **Baggage process**

For the routing, sorting and screening of baggage, Eindhoven Airport processes, for each item of baggage, the passenger name, the barcode of the suitcase and (if applicable) the passenger's frequent flyer number. These data are retained for seven days after the departure of the flight.

### **Crowd management**

For security purposes and to ensure that your journey via Eindhoven Airport is as pleasant as possible, we track how many passengers are at Eindhoven Airport to allow us to give you information on expected peaks and waiting times. In the terminal we use a Wi-Fi and Bluetooth tracking system for this. Apart from tracking the number of passengers, we can use Wi-Fi data to identify pedestrian traffic routes (and thus prevent congestion) and to increase the efficiency of our processes (creating and indicating alternative routes).

You are of course always free to switch off your Wi-Fi and Bluetooth. Eindhoven Airport uses sensors to trace Bluetooth and Wi-Fi signals. A device (mobile telephone, laptop, etc.) can be identified by its unique 'MAC address'. This MAC address does not link to individual user data, and therefore no personal data is compromised. Immediately after it has been detected, each MAC address is converted into a unique code by means of hashing. The original data are destroyed immediately and permanently, and can therefore not be 'retrieved', for instance in connection with a request for access. The unique code is also hashed by means of a 'salt' (data added randomly) that is unique per 24 hours. This enables us to track travel patterns of unique devices at the terminal of Eindhoven Airport within a single time-frame of 24 hours, but never for longer. The hashed data are stored for a maximum of three (3) years after which they are destroyed.

Eindhoven Airport also uses camera images for crowd management; the purpose is to gain insight into the number of people in queues, the density of people in spaces and the occupation of desks. That information can also be used to provide predictions with regard to the numbers of passengers/visitors and therefore also waiting and processing times. These camera images are stored for a maximum of 28 days after which they are destroyed.

## **D. Operation of Eindhoven Airport's online services such as its website and social media**

### **Website**

General data on website visits, such as the most frequently requested pages, are tracked on Eindhoven Airport's website without identifying visitors. The purpose is to be able to adapt the design of our website as much as possible to visitors' requirements. These data can also be used to place more targeted information on the site. This enables Eindhoven Airport to further optimise the services we offer to you via the website.

The Eindhoven Airport web server automatically collects IP addresses. Your IP address is a number with which computers on the network can identify your computer, so that data (such as internet pages) can be sent to your computer. We use IP addresses to manage the website and to ensure it is as relevant as possible.

### **Newsletter**

If you sign up for our electronic newsletter, you thereby give us your consent to use your email address to send you the newsletter. If you have also given explicit consent for receiving other information such as offers and questionnaires, we will send those to you as well. You can always unsubscribe from this via the link at the bottom of the newsletter page of every newsletter.

### **Cookies**

During your visit to the Eindhoven Airport website, our systems will create and consult cookies. A cookie is a compact piece of information which is stored on your computer. Most browsers accept cookies; however, it is generally possible to change the settings of a browser so that it no longer accepts cookies. Read more about the various types of cookies used by Eindhoven Airport, and how you can accept or refuse them in our [Cookie Statement](#).

### **Social media**

Our social media channels provide the latest news, information, offers and useful facts about Eindhoven Airport. These channels are an easy way to contact Eindhoven Airport, participate in discussions, respond to posted content or take action in some other way. We are always happy to exchange ideas with you and receive your opinion on Eindhoven Airport and its services. Engaging with customers like this allows us to continually improve our service. We request that you do not place privacy-sensitive information about yourself or others (e.g. email address, name, address, telephone number) on these channels, but that you share your information with us via a private message if necessary. Eindhoven Airport will only use the data shared by you to answer your question and to improve its customer service (for instance, by means of anonymised Q&As that can be modified by input from customers). Eindhoven Airport may remove publicly shared privacy-sensitive data.

### **Google Analytics**

Eindhoven Airport uses Google Analytics to calculate website statistics, such as the number of unique visitors, sessions and campaign data. This information is not shared with third parties and the IP address is anonymised.

### **E. Recruitment and selection**

Eindhoven Airport only uses applicants' personal data for recruitment and selection purposes. Unless required by law, Eindhoven Airport will not provide these data to other persons or bodies outside Eindhoven Airport without the applicant's prior consent. Applicants' data will be deleted no later than four (4) weeks after the application procedure has ended, unless the personal data are retained, with

the applicant's consent, for one year after the end of the application procedure with a view to possible future vacancies.

#### **F. Maintaining customer relationship**

Eindhoven Airport lets and manages office space at the airport. In connection with the performance of the lease contract and for maintaining the customer relationship, Eindhoven Airport processes contact details of contacts of its lessees.

Eindhoven Airport has a CRM system in which it processes contact details for maintaining the customer relationship with the contacts of its customers, such as airlines, ground handlers, forwarders, customers of telecommunication services, travel organisations and travel agents. The purpose is to inform these organisations and persons about the Eindhoven Airport products and services and/or to invite them to meetings and events. These data are not used for the purposes of sales.

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### **Data protection and storage**

Eindhoven Airport does everything within its power to protect your personal data against loss and unauthorised use. All Eindhoven Airport employees who have access to personal data as part of their work are required to maintain confidentiality. Your data will only be supplied to parties outside Eindhoven Airport if this is necessary for the performance of the aforementioned purposes. Eindhoven Airport has agreed in a data processing agreement with Eindhoven Airport partners who are responsible for performing certain services or parts thereof that they will also do everything within their power to protect the personal data and that they will comply with the provisions of the GDPR.

If a data leak/breach occurs despite the measures referred above, we will naturally handle it in accordance with the rules. If you yourself believe or suspect that there is a data leak, we ask you to report this as soon as possible via [privacy@eindhovenairport.nl](mailto:privacy@eindhovenairport.nl).

Eindhoven Airport will endeavour to ensure that processed personal data are accurate and precise. Moreover, Eindhoven Airport will not process more personal data than necessary, and will store them for no longer than is necessary for the purposes for which they were collected. Eindhoven Airport has defined/will define a suitable retention period for the various processing operations of personal data.

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## The recipients of your data

Only authorized persons who need personal data to perform their work have access to your personal data. The following persons and/or institutions may receive your personal data:

- a) anyone at Eindhoven Airport who is responsible for carrying out or supervising tasks related to the processing of your personal data or anyone involved in this;
  - b) processors and subprocessors contracted by Eindhoven Airport to perform certain tasks relating to the processing of your personal data;
  - c) (other) controllers who use your personal data for purposes of their own and inform you of this, such as airlines;
  - d) retailers at the airport;
  - e) within the scope of the (automatic) border passage, the Royal Netherlands Marechaussee insofar that is necessary for the performance of its duties;
  - f) government bodies, such as the police and judicial authorities, insofar as this is necessary to comply with statutory obligations.
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## Transfer of data to countries outside the EU

In certain cases, Eindhoven Airport transfers personal data to countries outside the EU, but ensures that this takes place in accordance with the relevant legal requirements, e.g. using EU model contract conditions.

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## Your rights

If your personal data have been collected by Eindhoven Airport, you have the right to request access to or rectification or removal of these data. You may also request us to transfer the data to another party or request that these data be processed only to a limited extent. Furthermore, you may object to the processing of these data.

In specific situations, Eindhoven Airport is not obliged to act on a request of a data subject, based on those rights, namely if imposing restrictions on the rights of the data subjects is necessary to safeguard, for instance: national or public security; the prevention, investigation, detection and prosecution of criminal offences or if this necessary to safeguard the rights or freedoms of others.

Below, you will find further explanation regarding the rights you have as a data subject. In addition, it is explained when and how you can exercise your rights.

### **Right of access**

You have the right to obtain from Eindhoven Airport confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if that is not possible, the criteria used to determine that period;
- e) the existence of the right to request rectification or erasure of personal data, or restriction of processing of personal data concerning you, or to object to such processing;
- f) the right to lodge a complaint with the Dutch Data Protection Authority;
- g) where the personal data are not collected from you, any available information as to the source of that personal data;
- h) the existence of automated decision-making, including 'profiling', if applicable.

### **Right to rectification**

You have the right to obtain from Eindhoven Airport without undue delay the rectification of inaccurate personal data concerning you or – taking into account the purposes of the processing – to have incomplete personal data completed.

### **Right to be forgotten**

You have the right to obtain the erasure of your personal data and Eindhoven Airport has the obligation to erase those personal data where, for instance, one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- c) the personal data have been unlawfully processed.

### **Right to restriction of processing**

You have the right to request restriction of processing where one of the following applies:

- a) you contest the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;

- c) Eindhoven Airport no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
- d) you have objected to processing (pursuant to Article 21 (1) of the GDPR) pending the verification whether the legitimate grounds of Eindhoven Airport override your own.

### **Right to data portability**

You have the right, under certain circumstances and solely where technically feasible, to receive the personal data concerning you, which you have provided to Eindhoven Airport, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller.

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, including profiling based on those provisions. We will stop processing your personal data after receiving your objection, unless we can provide compelling legitimate reasons which outweigh your interest, rights and freedoms.

If we process your personal data for direct marketing purposes, you have the right to object at any time and we will immediately stop processing data for those purposes.

### **Exercise your rights**

Is your personal data processed based on consent? Then you have the right to withdraw your consent. Any withdrawal of consent is without prejudice to previous processing based on consent.

If you want to make use of one or more of your rights listed above, you can mail to [privacy@eindhovenairport.nl](mailto:privacy@eindhovenairport.nl) or send your request by post to:

Eindhoven Airport N.V.  
Privacy Officer  
Luchthavenweg 13  
5657 EA Eindhoven

In addition, please send us a copy or scan of your valid identification. Do not forget to foreclose your photo and social security number (BSN number) (top right and bottom of the series of your identification document). After identification, we will decide on your request within four (4) weeks, unless we have informed you that we need more time.

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## Questions, complaints or objection

If you have any questions about this Privacy Statement or complaints about our privacy policy, or if you wish to object to the processing of your personal data by Eindhoven Airport, you can contact us by email [privacy@eindhovenairport.nl](mailto:privacy@eindhovenairport.nl).

If you are dissatisfied with the way in which we treat your privacy and/or the rights referred to above, you can file a complaint with the Dutch Data Protection Authority via <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens?qa=klacht>.

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## Amendments to our Privacy Statement

Eindhoven Airport reserves the right to revise its Privacy Statement from time to time. This may be the result of changed policy, changes in data processing or changes in the systems with which Eindhoven Airport processes data. This is a continuous process. The most recent version of the Privacy Statement is always available on our website, and we advise you to check it regularly.

This version was drawn up on 26 June 2018.

Eindhoven Airport N.V.

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