

## **Blue City Aviation Limited – Privacy Policy**

### **Introduction**

Blue City Aviation Limited a licenced aircraft handling agent at Birmingham Airport, has a requirement to process your personal data. This notice explains how and why your data is processed by us when you use our services, purchase goods or services from us or use our website.

References in this Policy to "we", "us" "our" and "Blue City Aviation" are to Blue City Aviation Limited (company number 05011944), registered office Room 25, 1st Floor, Elmdon Building, Birmingham International Airport (Cargo), Birmingham, West Midlands, B26 3QN.

As part of our General Data Protection Regulation (GDPR) responsibilities, we are required to provide you with certain information. This is your 'Right to be Informed'. This information is contained in the notice below. If you require clarification of any of the information contained in this notice, please do not hesitate to contact our Data Protection Officer on the contact details listed below.

### **Why are we allowed to process your personal data?**

In this instance, the legal basis for processing your personal data in this way is the EU General Data Protection Regulation (GDPR) - Article 6 (1)(c) – Legal Obligation.

### **What personal data do we collect?**

- In accordance with UK Border Force Clearance Requirements we are obliged to collect personal details from all passengers and crew landing from outside the UK. This includes full names, dates of birth and passport details including of any required visas. We are also required to process and inform them of all flight details, including aircraft registration.
- In order to comply with Birmingham Airport regulations, we are obliged to request a security pass for anyone requiring airside access, we must send them full names, dates of birth and a passport size photo.
- For all Blue City customers, we would keep contact details such as name, telephone number or email addresses.
- Communications from individuals through our contact form on our website.
- For billing purposes, we may keep bank account information and by prior agreement credit card details.

### **Why do we need your data?**

We may need your information to arrange customs and immigration clearances with UK Border Force. We may also need certain personal data from you in order to make an application to Birmingham Airport for an airport ID security pass.

UK Border Force Clearance is required for all flights, passengers and crew arriving from outside the UK. We are obliged to lodge with them passenger and crew details including full names, dates of birth and passport details.

A security pass is required to access the airside areas of the airport and the Airport Authority will need certain personal data in order to check the eligibility and suitability of an applicant and to administer the airport ID security pass scheme in accordance with regulatory requirements set out by the Civil Aviation Authority.

We will only ask you for information which is absolutely necessary for these purposes.

### **Who will we share your personal data with?**

Your personal data will be submitted electronically to UK Border Force and held in their secure systems.

For ID purposes your data is put onto two ID Centre systems, which are provided by ID Gateway and CEM. They will have access to the personal data held in the software for the purposes of supporting the IT infrastructure only, they will not have access to the information for any other purpose.

### **Where will your personal data be stored or transferred to?**

Your personal data is stored securely within the UK. It will not be transferred out of the European Economic Area.

### **How long will we store your data?**

Blue City Aviation is committed to keeping your personal information only for so long as is necessary or where we have a legitimate interest to continue doing so.

In line with Birmingham Airport policy, personal data collected in support of a permanent airside ID security pass will be held for the duration of the pass plus one day, after which it will be permanently and securely deleted.

Unless otherwise agreed, for a temporary pass the information is permanently and securely deleted once the pass has expired.

We will keep your personal data during the period of your relationship with us and then, after that period ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others, but we will only retain your personal data for a limited period of time. This period will depend on several factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason

Where you pay for services using a credit card, we will only retain your personal details for a reasonable period of time after you have completed the transaction in order to fulfil any contractual obligations such as refunds or additional charges.

### **How can you manage the personal data we hold about you?**

If you would like more information on the data we hold about you or would like to make changes to, or request the deletion of the data we hold about you, you are entitled by law to make a “Data Subject Request.” If you wish to make such a request, send our Data Protection Officer an email at [dataprotection@bluecityaviation.co.uk](mailto:dataprotection@bluecityaviation.co.uk). Please note that we may need to exclude certain information as part of your request, e.g. in order to protect the privacy of other individuals or if we are permitted to exclude the information for legal or other reasons.

### **Are we using automated decision making or profiling with regards to your personal data?**

No. As a processor Blue City Aviation do not make any decisions or undertake any profiling based on the personal data you have provided to us.

### **Your Rights**

EU GDPR very importantly provides for several rights for you as an individual.

These are as follows:-

- 1) Right to be informed
- 2) Right of access
- 3) Right to rectification
- 4) Right to erasure
- 5) Right to restrict processing
- 6) Right to data portability
- 7) Right to object

If you would like to know more about your rights or want to discuss any aspect of them with us, please do not hesitate to contact our Data Protection Officer at any time. Contact details below.

#### **Kevin Perry**

Blue City Aviation Limited  
Second Floor, Argosy Building  
Birmingham Airport  
B26 3QN

**Email:** [dataprotection@bluecityaviation.co.uk](mailto:dataprotection@bluecityaviation.co.uk)

**Phone:** 0121 782 9300

Additionally, more information about your rights can be found on the Information Commissioners Office (ICO) website [www.ico.org.uk](http://www.ico.org.uk).