

IT Security, Risk & Compliance

**daa Privacy Statement**

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# Privacy Statement Overview

At daa plc / Dublin Airport / Cork Airport in keeping with our commitment to be open with all passengers, customers, partners and employees, we have developed this **Privacy Statement Overview**, a quick and simple summary explaining how we manage, share and look after your information.

Further details regarding specific areas such as Car Parks, Fast Track, Lounge Services or Platinum Services can be accessed via the links below.

We are determined to deliver a great welcome and a great service to all passengers, customers, and partners. To enable this, we need to collect a range of information about you, such as your name and flight details, if you are a passenger, or your name, car registration, and email address, if you are a car park customer. This Privacy Statement covers people who may interact with us in the following ways:

* People that use products or services offered via [the] daa / Dublin Airport / Cork Airport / websites, including The Loop Click and Collect, and Dublin / Cork Airport Parking
* People that sign up to receive information from daa / Dublin Airport / Cork Airport (e.g. newsletters)
* People that send us feedback via our websites or social media channels
* Visitors to our websites
* User of our Dublin Airport app [delete from Cork site]
* Passengers and other visitors to daa-owned properties, Dublin Airport and Cork Airport.

# Reasons for Processing your Data

We fully respect your right to privacy and undertake to only collect data as required to deliver the services you need, or with your clear permission and consent. In addition, we are required to implement statutory regulations in civil aviation as part of our role as an airport operator. The reasons for processing your data may include the following:

1. **Delivering the passenger experience** – our job is to get you through your airport journey as smoothly and comfortably as possible. Due to the highly regulated nature of air travel, we are required to process data for safety and security reasons as described in 6 below.
2. **Providing additional services at the airport** – we provide additional services which you may choose to use to enhance your journey. In providing these services to you, we may need to gather some data. Additional services we deliver directly include:
   * **The Loop Retail Services** – ‘**Click & Collect’** – we offer a ‘Click & Collect’ service that requires us to collect information to enable us to identify you at the point of collection and to communicate with you if you ask us to – [see here](https://www.theloop.ie/t/ShopCollect) for the loop.ie and [see here](#_Detail_Section_6_1) for Privacy Statement details.
3. **Providing free wi-fi while you use our airports** – under Irish law, all ‘Internet Service Providers’ or ISPs are obliged to maintain records of internet access for a period of 12 months. As we do not collect your name as part of the wi-fi sign-up, we store the IP address assigned to you and the MAC address of the device you used to access to wi-fi service. We keep these records as required by law.
4. **Protecting the welfare of passengers, visitors and staff at Dublin / Cork Airport** – we may need to record personal details relating to any individuals involved in incidents or accidents in the airport or its environs.
5. **Ensuring the safety and security of civil aviation** – this includes CCTV.

Measurement:

* 1. Safety and Security – Closed Circuit Television (CCTV) – as the operator of Cork and Dublin Airports, we are obliged to keep the airports and their environs safe and secure. To assist us in this, we operate CCTV security systems both landside and airside and our Airport Police manage these important security controls. CCTV images of you are considered to be personal data and we carefully safeguard access to these images. We retain all CCTV footage for 30 days.

# Direct Marketing Communications

If we wish to gather information to contact you, e.g. for marketing purposes, we will ask for your consent to do so in advance. If you have purchased products or services from us, we may offer you reminders or information to assist us in delivering those services unless you have asked us not to contact you in relation to products or services purchased. If you have provided consent, you can unsubscribe at any time to remove that consent.

[Click here](#_Detail_Section_8_1) for further details and our Direct Marketing Permissions statement.

# Data Sharing with Law Enforcement

Where data is provided by us to a regulatory body or law enforcement agency to meet statutory or regulatory obligations, activities undertaken by those parties is outside our control and hence fall outside of the scope of this Privacy Statement.

Agencies that we may be obliged to share information with include:

* An Garda Síochana (National Police Service)
* Garda National Immigration Bureau (GNIB)
* Irish Naturalisation and Immigration Service (INIS)
* Revenue – Irish Tax and Customs Service.

# Security and Confidentiality

Any personal information that you provide to daa or its subsidiaries will be treated with the highest standards of security and confidentiality and handled in accordance with Data Protection laws and the General Data Protection Regulation.

Security of your personal data is very important to us. We take all reasonable technical and organisational measures to prevent the loss, misuse, unauthorised access, disclosure, or alteration of your personal data. These measures include:

* We apply various levels of access control to restrict access to your personal information to daa employees and contractors who require a level of access as part of their role
* We work with experienced, specialised vendors to develop and maintain our platforms
* We regularly review and audit our security and data protection policies and procedures to ensure a high level of operational security is maintained.

# Cookies and Web Browsing

Our websites use cookies. Cookies are small text files which are created on your computer or mobile device when you visit a website. They enable your web browser (such as Internet Explorer or Mozilla Firefox) to remember which pages on a website you have visited and can also allow you to set preferences on some sites. Your web browser then sends these cookies back to the website on each subsequent visit so that they can recognise you and remember things like user preferences.

You can use our websites with no loss of functionality if cookies are disabled in your web browser.

By using our website, you are consenting to our use of cookies. You may opt out of the use of cookies by following the guidance provided in the [Cookies and Web Browsing Statement here](#_Cookies_and_Web).

# Contact Us

If you have any general queries about your experience in dealing with us, please contact [customerexperience@daa.ie](mailto:customerexperience@daa.ie).

If you have any questions or comments about this Privacy Statement, please contact our Data Protection Officer by email at [dataprotection@daa.ie](mailto:dataprotection@daa.ie) or in writing at:

Data Protection Officer,

Cargo Building 6, Corballis Park,

Dublin Airport.

# Data Access Requests

You have a right to obtain a copy of any information relating to you kept on computer or in a structured manual filing system by daa. All you need to do is write to us and ask for it under the Data Protection Acts. We refer to these requests as Data Access Requests.

Please download the [PDF here](https://daacrm.sharepoint.com/sites/ITSecurity/DataProtectionDocLibrary/daa%20DPO%20-%20Data%20Access%20Request%20User%20Guide%20V1.1.pdf) for Data Access Request guidance.

# Changes to Privacy Policy

We review our Privacy Statements on a regular basis, and any updates will be highlighted in the version date below.

This Privacy Statement was last updated on: 27 April 2018 and is effective from 25 May 2018.

**How we treat sensitive information**

We will not collect any sensitive information / special categories of personal data relating to you for the purposes outlined in this statement.

**Your rights in relation to your information**

Your rights as a data subject are as follows:

1. Right of access – you have the right to find out if we hold any personal data relating to you. You also have the right to obtain a copy of any such personal data we hold on you. The request is referred to as a ‘Data Access Request’. [Link to Data Access Request section of Summary page]
2. Right to rectification – you have the right to request we rectify any information we hold about you that is inaccurate.
3. Right to erasure – you have the right to request we erase any information we hold on you, provided there are valid grounds for doing so.
4. Right to restriction of processing – you have the right to request we temporarily restrict the processing of your personal data, provided there are valid grounds for doing so.
5. Right to data portability – you have the right to obtain a machine-readable copy of the information we hold on you, and have it transferred to another controller if required.
6. Right to object – you have the right to object to the processing of your personal data, namely in the case processing is carried out in the legitimate interests of daa.
7. Right to lodge a complaint – if you are unhappy with how we have acted in handling your personal data, you have the right to lodge a complaint with the supervisory authority in your EEA country of residence, place of work, or with the Office of the Data Protection Commissioner in Ireland.

# Detail Section 1 – The Loop

[Link back to Privacy Statement Overview](#_Privacy_Statement_Overview)

**The Loop Privacy Statement**

This Privacy Statement applies to all personal information collected by daa plc for the purposes specified below. The purpose of this statement is to let you know what to expect when daa collects personal information about you via our websites, telephone, email, mobile devices, manual forms, or in person.

With this Privacy Statement, we want to provide transparency on how we treat personal data and the purposes for which we collect data.

This Privacy Statement applies to individuals that:

* Purchase goods at one of our stores or websites
* Sign up to receive information such as newsletters and offers
* Submit a query via email, phone, online form or postal correspondence
* Visit our website or use one of our apps.

**The information we collect about you**

We may collect information about you via this website, telephone, email, mobile devices, forms, or in person. We may collect the following personal information from you:

* Shop and Collect – for purchases made in store for collection at a later date from a collection point – we may collect your name, contact number, flight information and credit card details
* Click and Collect – for purchases made online for collection from a collection point – we may collect your name, email address, contact number, and credit card details.

For in-store purchases we do not collect personal data (we do not retain payment data in our shops). However, in order to provide duty free prices, we collect flight details as provided on your boarding card. The information collected is limited to the item purchased and flight information such as the airline and destination details.

**The purpose for collecting this information**

We collect this information about you to enable us to complete the transaction for the product you have purchased. Your personal data is processed in this respect for the performance of the contract between daa, as data controller, and you, the data subject.

**Boarding Card information** may be collected in order to provide duty free prices. We collect this information to comply with legal and regulatory obligations.

**Passport information** – your passport may be requested in retail outlets that are past US Preclearance, officially known as US Customs & Border Patrol (USCBP) to verify your age and residency status. As you have already passed US Customs at this point in your journey, you are subject to US requirements. We collect this data under the terms of the treaty to implement USCBP agreed between Ireland and the USA.

Competitions – we may collect information when you enter competitions we run in-store or via our social media channels. We process this information to select competition winners and fulfil delivery of any such prizes, in line with our competition [terms and conditions](https://www.theloop.ie/t/TermsConditions). We will ask for your consent to collect this information.

**Staff purchases** – if you are a member of staff at Dublin Airport or its associated affiliates, we may also collect information such as your Airport ID number. This information is required to enable us to complete the transaction for the product you have purchased. We collect this data as part of the fulfilment of a sales contract with you as a person eligible for a discounted price.

**Newsletter or direct marketing communications** – where you have provided personal data not necessary for completing a transaction, such as signing up for a newsletter, we will ask for your consent as the legal basis for collecting this information. You can withdraw consent at any time by – *<link to the Marketing Communications Privacy Statement here>*.

Information you provide may also be used to conduct statistical analysis of our products / services, analyse future trends and build customer profiles. This processing is carried out in daa’s legitimate interests and allows us to ensure customers continue to find our products valuable and so that we can continue to invest in the infrastructure to meet customers’ future needs at Dublin / Cork Airport. This does not affect your rights as a data subject. See <*Link to ‘Your rights in relation to your information’ section in statement*> for more.

**With whom we may share this information**

At times, we engage third parties to assist us in providing our products / services. Your personal data may be shared with these organisations to allow us to provide you with the product / service you have requested.

We may share your data with the following types of organisations:

* Software providers
* Web designers
* Payment processors.

We will never share your information with these organisations for marketing purposes.

**Data Transfers**

All personal data collected for the purposes specified in this statement is processed inside the European Union (EU) or the European Economic Area (EEA) and will never be transferred to countries located outside the EU or the EEA.

**Retention – how long we keep this information**

When you provide us with personal information, we delete this information in line with our data retention policy. We will retain the following personal data you have provided for the following time periods

* Transactional information on the websites or at the tills – six (6) years after transaction
* We do not retain full card details unless you have consented to us doing so.

**How we treat sensitive information**

We will not collect any sensitive information / special categories of personal data relating to you for the purposes outlined in this statement.

**Your rights in relation to your information**

Your rights as a data subject are as follows:

1. Right of access – you have the right to find out if we hold any personal data relating to you. You also have the right to obtain a copy of any such personal data we hold on you. The request is referred to as a ‘Data Access Request’. [Link to Data Access Request section of Summary page]
2. Right to rectification – you have the right to request we rectify any information we hold about you that is inaccurate.
3. Right to erasure – you have the right to request we erase any information we hold on you, provided there are valid grounds for doing so.
4. Right to restriction of processing – you have the right to request we temporarily restrict the processing of your personal data, provided there are valid grounds for doing so.
5. Right to data portability – you have the right to obtain a machine-readable copy of the information we hold on you, and have it transferred to another controller if required.
6. Right to object – you have the right to object to the processing of your personal data, namely in the case processing is carried out in the legitimate interests of daa.
7. Right to lodge a complaint – if you are unhappy with how we have acted in handling your personal data, you have the right to lodge a complaint with the supervisory authority in your EEA country of residence, place of work, or with the Office of the Data Protection Commissioner in Ireland.

# Detail Section 2 – CCTV

[Link back to Privacy Statement Overview](#_Privacy_Statement_Overview)

**daa CCTV Privacy Statement**

The purpose of this statement is to let you know what to expect when daa plc (daa) collects personal information via Closed Circuit Television (CCTV) cameras located through the Dublin [Cork] Airport campus. With this Privacy Statement, we want to provide transparency on how we treat personal data and the purposes for which we collect data.

This Privacy Statement applies to people that visit the Dublin Airport campus.

This Privacy Statement does not apply to CCTV data processing by third parties, such as airlines, handling agents, or retail tenants. daa has no access to data processing by third parties or to the data involved, unless otherwise stated, and cannot be held responsible for it.

**The information we collect about you**

We operate CCTV cameras located through the Dublin Airport campus, including in terminal buildings and surrounding environs. Your personal data may be collected through the operation of these CCTV cameras.

**The purpose for collecting this information**

The purpose for collecting the personal information that you provide is to allow us to:

* Protect the safety of passengers and staff at Dublin Airport
* Prevent, detect, and respond to criminal activity
* Comply with our legal and regulatory obligations to safeguard and protect civil aviation
* Investigate safety and security incidents in response to reported incidents, complaints, claims, or regulatory / compliance audits or other issues.

CCTV data may also be used to monitor passenger or vehicle flows or to conduct statistical analysis of those flows. This processing is carried out in daa’s legitimate interests and allows us to ensure we can continue to invest in the infrastructure to meet passengers’ future needs at Dublin Airport. This does not affect your rights as a data subject. See your rights in relation to your information below [add link].

**Why we may share this information**

We may be required to share your information to

* Comply with our legal and regulatory obligations
* Investigate safety incidents, security incidents or criminal activity.

**With whom we may share this information**

We may share personal data relating to you recorded on CCTV with

* Competent authorities such as An Garda Síochana or the Irish Aviation Authority
* Third parties who operate retail outlets, or who provide services to passengers such as airlines or handling agents where we have a statutory obligation to do so.

**Data Transfers**

All personal data collected for the purposes specified in this statement is processed inside the European Union (EU) or the European Economic Area (EEA) and will never be transferred to countries located outside the EU or the EEA.

**Retention – how long we keep this information**

We retain CCTV footage for thirty (30) days. Any CCTV footage identified as relevant to a formally reported incident is retained for six (6) years from the date of the reported incident. Where an investigation or claim arising from a reported incident take longer than 6 years to be processed, the CCTV footage identified as relevant to that incident may be retained for longer than 6 years.

**Your rights in relation to your information**

Your rights as a data subject are as follows:

1. **Right of access** – you have the right to find out if we hold any personal data relating to you. You also have the right to obtain a copy of any such personal data we hold on you. The request, referred to as a ‘Data Access Request’. [Link to Data Access Request section of Summary page]
2. **Right to rectification** – you have the right to request we rectify any information we hold about you that is inaccurate.
3. **Right to erasure** – you have the right to request we erase any information we hold on you, provided there is valid grounds for doing so.
4. **Right to restriction of processing** – you have the right to request we temporarily restrict the processing of your personal data, provided there are valid grounds for doing so.
5. **Right to object** – you have the right to object to the processing of your personal data, namely in the case processed is carried out in the legitimate interests of daa.
6. **Right to lodge a complaint** – if you are unhappy with how we have acted in handling your personal data, you have the right to lodge a complaint with the supervisory authority in your EEA country of residence, place of work, or with the Office of the Data Protection Commissioner in Ireland.

# Detail Section 3 – Direct Marketing

[Link back to Privacy Statement Overview](#_Privacy_Statement_Overview)

**Direct Marketing Permissions Statement**

This Privacy Statement applies to individuals that have given their consent to avail of direct marketing communications from daa plc regarding promotions, products or services electronically via email, SMS and / or push notifications.

We would like to provide you with information about new products, promotions, special offers, services and other information that we feel you may be interested in. As part of a purchase on our digital channels, we offer you the opportunity to opt in to our marketing communications.

You will always be given the opportunity to withdraw that consent on every electronic communication you receive from daa plc by unsubscribing at any time.

When you sign up to marketing communications, we’ll normally contact you by email, but we may also send you marketing texts if you have given us your mobile number for this purpose.

# Detail Section 4 – Cookies etc

[Link back to Privacy Statement Overview](#_Privacy_Statement_Overview)

**Cookies and Web Browsing**

Web Browsing

Technical details in connection with visits to our websites are logged for statistical purposes only. No information is collected that could be used by daa plc to identify website visitors. The technical details logged are confined to the following:

* the top-level domain name used (e.g. .ie, .com, .org, .net)
* data which shows the traffic of visitors around this website (such as pages accessed, and documents downloaded)
* the type of web browser used by the website visitor.

Some of the above information is used to create summary statistics, which allow us to measure the number of visitors to our sites, identify what pages are accessed most frequently and generally help us to increase the usability and accessibility of our sites. We do not release any information or statistics to third parties. By using our websites, you accept the practices described in this Privacy Statement.

How we use cookies

Cookies are small text files a website will place on your hard drive to record your preferences on a site or help identify trends for statistical purposes.

It is important to note that accepting cookies used on our sites does not give us access to any personal information.

Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept certain cookies by adjusting the preferences in your browser. You can find information on how to adjust your cookie preferences for popular browsers below.

Functional

Content Management System - cookies are used as part of the software used to manage and update our website content. The information gathered is not retained and the cookie is deleted when the browser is closed.

Performance

Analytics - cookies are used to collect information anonymously to help daa better understand and improve how people interact with our site - they do not record personal information. The cookies collect information including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Security

These cookies enable daa to provide important secure features and services. Without them, accessing secure online services like The Loop website and Car Parking booking would not be possible.

Advertising Cookies

daa use advertising cookies to measure the effectiveness of advertising campaigns and how we can improve them for you. The advertising cookies used by daa are anonymous and are not used to collect information which can identify the user.

The following cookies are used specifically on this website:

|  |  |  |
| --- | --- | --- |
| **Cookie name** | **Expiry** | **Description** |
|  |  |  |
| FGTServer | 1 day | The value of the cookie encodes the server that traffic should be directed to. |
| IDE | 1.5 years | This is the cookie used to serve targeted advertisements across third party websites when you leave our website. |
| \_dc\_gtm\_UA-63215094-6 | 10 minutes | Tracking cookie for Google tag manager that allows daa to understand your activity on the website |
| \_ga | 2 years | Google Analytics cookie to record a user’s session |
| \_gat\_UA-63215094-6 | 10 minutes | Cookie is used to send requests to doubleclick.net for third party advertising |
| \_gid | 24 hours | Google Analytics cookie for distinguishing users across demographics |
| fr | 1 month | Enables remarketing when site visitors use Facebook over encrypted ID |
| lang | Session | Remembers the user's selected language version of a website |
| cookieconsent\_dismissed | 1 year | Cookie set to determine if the user has agreed to site cookies banner and implied consent. |
| sf\_timezoneoffset | Session | The time zone difference between UTC and the user's local time, in minutes. |
| 1P\_JAR | 1 week | These cookies are used to gather website statistics, and track conversion rates. |
| CONSENT |  | Consent to cookie for Google Analytics which lets us understand how you use our website. |
| NID | 1 year | The NID cookie contains a unique ID that remembers your preferences and other information, such as your preferred language |
| \_gali | 1 day | This first party Google Analytics cookie is used by Google Analytics to specify user's country. |
| \_\_atuvc | 13 months | Usage cookie to track addthis.com social sharing service |
| \_\_atuvs | Session | Usage cookie to track addthis.com social sharing service |
| uid | 1 year | Usage cookie to track addthis.com social sharing service |
| uvc | 13 months | Usage cookie to track addthis.com social sharing service |
| vc | 1 year | Usage cookie to track addthis.com social sharing service |
| bt2 | 255 days | Usage cookie to track addthis.com social sharing service |
| di2 | 255 days | Usage cookie to track addthis.com social sharing service |
| loc | 13 months | Usage cookie to track addthis.com social sharing service |

How to delete or set cookie options in browsers

Should you wish to you can delete or block the use of cookies in your browser settings. However, once you do this, some features of our websites may not work as intended.

You can delete the cookies stored on your device or alternatively you can change your privacy settings on your browser via the following links:

* [Microsoft Internet Explorer](http://windows.microsoft.com/en-IE/windows-vista/Internet-Explorer-browser-settings)
* [Google Chrome](https://support.google.com/chrome/?hl=en#topic=7438008)
* [Mozilla Firefox](https://support.mozilla.org/en-US/products/firefox/privacy-and-security)
* [Safari](https://support.apple.com/en-us/HT201265)
* [Opera](http://help.opera.com/opera/Windows/2393/en/private.html)

Microsoft Internet Explorer

1. Open the 'Tools' menu
2. Select 'Internet Options'
3. Open the 'Security' tab
4. Choose the 'Internet' zone
5. Identify the security level 'High' for this zone
6. Click 'OK'.

Google Chrome

1. Open the 'Menu' (icon) on the toolbar
2. Choose 'Settings'
3. Open 'Advanced Settings'
4. Go to the 'Privacy' section and click on 'Content Settings'
5. In the 'Cookies' section, you can choose how cookies are used when you browse using Chrome.

Mozilla Firefox

1. Open the 'Edit' menu
2. Choose 'Preferences'
3. Open 'Privacy & Security'
4. Choose 'Cookies'.