

## Training Academy Privacy Notice

### 1 Introduction

We take your privacy seriously. This privacy notice documents your privacy rights and how we gather, use and share personal data about you in connection with the provision of training courses and other continuing professional development services (**Training**) to you through our Training Academy, in accordance with the UK Data Protection Act 2018, the EU General Data Protection Regulation (EU) 2016/679, as well as other data protection and privacy laws and separate UK data protection law as may be updated or replaced from time to time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information. We will update this notice if we make any significant changes affecting how we use your personal data, and if so we will contact you to let you know about the change.

### 2 About us

We are what is known as the 'controller' of personal data we gather and use. When we say 'we' or 'us' in this notice, we mean Edinburgh Airport Limited (**EAL**).

We may amend this notice at any time.

### 3 Your Privacy Rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, or for more information about your rights, please contact the EAL Data Protection Officer at [dpo@edinburghairport.com](mailto:dpo@edinburghairport.com).

- **Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or the legitimate interests of a third party) to process your personal data and there is something about your particular situation which makes you want to object to processing on these grounds.
- **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge.
- **Consent:** In most circumstances, we won't need your consent to use your personal data as it is necessary to undertake such processing for the performance of our obligations under a contract with you to provide you with Training. There may be circumstances where we may ask for your consent to process your information. Where you have given us your consent to use personal data, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Where we are required by law to keep certain information, we will be unable to delete such information.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred to you or a third party.

- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated decision-making:** You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you.

#### **4 What Kinds of Personal Data We Use**

In the course of us providing you with Training, we may collect, store, and use the following categories of personal data about you.

- full name;
- date of birth;
- email address;
- contact telephone number;
- employer;
- emergency contact name and telephone number;
- job title;
- your training history and qualifications;
- information regarding your performance and submissions in respect of your training course or qualification;
- information regarding whether or not you are eligible/fit to undertake practical fire training; and
- online identifiers (such as your IP address).

Some kinds of personal data identified above are given special protection by the law – these are called 'special category' personal data. We do not collect or otherwise process any 'special category' personal data in connection with the provision for Training with the exception of the above Practical Fire Training Disclaimer.

#### **5 How We Gather your Personal Data**

We will obtain personal data from your employer or prospective employer when they register you on one of our training courses. We shall also obtain personal data directly from you where you provide us with information in connection with your registration for a training course, or whilst we are providing you with Training, or when you otherwise communicate with us.

#### **6 How We Use your Personal Data and the Legal Basis for Processing**

We only use your personal data where it is permitted by the laws that protect your privacy rights.

The legal basis and purposes for processing your personal data in the delivery of Training are:

- primarily, so that we can fulfil our contractual obligations to you and your employer as a provider of Training services;
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms (for example, the proper administration of our Training Academy or in the proper provision of Training to you); and

- to comply with our legal and regulatory requirements (for example, to ensure that you have received the appropriate training to allow you to competently undertake your role).

We seek to ensure that our collection and processing of your personal data is always proportionate.

## 7 If You Fail to Provide Personal Data

If you fail to provide personal data when requested, we may not be able to provide you with Training services, certify that you are eligible to receive a qualification, or record or verify your completion of any Training which you have received from us.

## 8 Sharing your Personal Data with Others

We will share your personal data with third parties where you have given us consent to do so, where we are required to do so by law, or where we or the third party has a legitimate interest and it is fair and reasonable in the circumstances to share the information. We will only share your personal data to the extent needed for those purposes.

We shall share your personal data with:

- **your employer / prospective employer** for the purposes of verifying that you have participated in any training course, and the results of any connected assessments (where applicable);
- **qualification accreditation bodies**, such as the Scottish Qualifications Authority, as required to enable the award of any qualification;
- **government and regulatory bodies** such as the Health and Safety Executive, the Civil Aviation Authority, or the Department of Transport, where we have a legal obligation to do so (such as to confirm that you have complied with any statutory training requirements necessary to undertake your role); and
- **our external service providers** who are involved in the administration and provision of the Training which we provide to you, such as our training platform provider.

## 9 Data Retention

We will never retain your personal data for any longer than is necessary for the purposes we need to use it for.

We are required to keep a permanent record of all persons that have completed a training course with us. For these purposes we shall only retain such personal data as is necessary to record your participation and as necessary for the award of any qualification. We will only hold your name, job role, employer, and the details of the training course which you undertook with us for such purposes.

## 10 Transfers Outside the UK

We may need to transfer your personal data outside the UK where your employer is based outside of the EEA, or to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area.

We will only transfer your personal information outside the EEA where either:

- (a) the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or
- (b) we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

## 11 Right to Complain

You can make a complaint to us about how we handle and use your personal data by first contacting the EAL DPO at [dpo@edinburghairport.com](mailto:dpo@edinburghairport.com) and then if not satisfied, to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.