ID: 16903-1

Privacy policy Sandefjord Lufthavn AS   **Sandefjord Lufthavn AS**

Prosess	KS / Visjon, verdier, strategi og policy / Personvernerklæring	**Dokumentkategori**
Godkjent dato	29.03.2019 (Gisle Skansen)	
Endret dato	24.03.2019 (Stig Lindahl)	

Privacy policy Sandefjord Lufthavn AS

Innhold

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1. Introduction

It is requested that you read this privacy statement carefully so that you know how and why Sandefjord Airport AS processes information about you. This privacy policy describes how Sandefjord Lufthavn AS (hereinafter referred to as "SLH") processes personal data.

Personal data is defined in the EU privacy regulation 2016/679 as *"any form of information about an identified or identifiable natural person registered"; with identifiable natural person means a natural person as direct or indirectly identifiable, in particular by an identifier such as e.g. name, one identification number, location data, an online identifier or one or more elements that are specific to the physical, physiological,genetic, psychological, economic, cultural or social identity."* as "Personal Information"). The information is considered Personal Data regardless of whether they are text, images, audio or video.

It is important for SLH that your rights are not violated. SLH will not treat Personal information about you without your compliance with applicable law wishes, agreement between you and SLH and this privacy statement.

2. The person responsible for the treatment - who is responsible for the information treated in accordance with the requirements of the law

Sandefjord Lufthavn AS (org. no. 92895997) can be responsible for treatment the processing of personal data. Please contact us if you have any questions this privacy statement or for other privacy concerns.

Contactinformation:
Sandefjord Lufthavn AS
Torpveien 130
3241 Sandefjord

Inquiries can also be sent by e-mail to personvern@torp.no . SLH's privacy officer will receive inquiries on this e-address. It must be stated in the subject field what this applies to. Regular email is unsecured and unencrypted. We therefore encourage you not to send confidential or sensitive personal information by e-mail. Sensitive personal data may be health and health-related conditions, sexual orientation, criminal law, political or religious opinion and ethnic background.

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3. Non-identifiable information

3.1 SLH's website www.torp.no

All use of SLH's website is based on volunteerism. SLH processes non-identifiable information about the users of our site. The purpose is to improve and enhance the content and usability of the site. SLH does not and cannot connect the information directly to each user.

Cookies

When you visit SLH's website, your browser will download cookies. These are small text files that are exchanged between your browser and our site. This is used to make the site work as well as possible. As a web user you can choose to reject storage and the use of cookies.

https and secure transfer

SLH's website uses encryption with HTTPS. If you want to make sure that a page is encrypted, it will say "https" instead of just "http" in the browser's address field. Most browsers will also display a padlock. The purpose of encryption is to secure a secure data communication between server (SLH's website) and client (your PC, mobile, tablet etc.). This includes a digital certificate to prove the site and its sender is real.

Cookies

CoreTrek AS delivers the publishing tools to SLH's website and which stands for technical development, operation and maintenance. CoreTrek AS uses the following cookies on the SLH website:

➢ *CorePublishSession*

The cookie ensures that the publishing solution works. This is a "Session cookie" removed from the computer when the user closes the browser. This cookie has a reference ID for a session file on the web server. The session file will not contain Personal Information for anonymous users. The session file is deleted automatically 15 minutes after the user has closed the browser or been inactive. Only system administrators have access to these Session files.

➢ *Ctdevicecachekey*

The cookie will identify which type of device and browser you are using. The capsule has a duration of one week and makes it possible for

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SLH's website to display content to the right type of device (PC, mobile, tablet, etc.) The cookie does not contain Personal Information.

Sharing information

It is possible to share articles through e-mail and social media. E-mails used to share articles are not logged. Further handling of data shared in social media is governed by your agreement with the relevant media community.

Statistics and log

When you visit SLH's website, information will be saved in a database. Personal Information is not saved. Information about which pages you have visited is saved in a raw data table. This information will be used to generate statistics for the number of page views per object (menu item, article, file), per server and per keyword. All data in the raw data table is deleted after two days and the remaining statistics contain only summarized data that cannot be used to identify the individual visitor.

SLH also uses Google Analytics to store visitor data. IP-addresses are not stored and it is not possible for SLH to connect visitor statistics to the individual visitor. The visitor statistics are only available for the web editor and the IT department of CoreTrek AS.

CoreTrek AS saves "user agent", IP address and which site the visitor has visited in the web server logs. These logs are used solely for work around troubleshooting and security, and no data is extracted or used from these logs. The logs are deleted after a given interval, usually 4 weeks. Only administrators of the web server at CoreTrek AS have access to these.

SLH's website can link to websites or applications that are owned and operated by others businesses. SLH is not responsible for neither content nor treatment of personal information on other websites or applications owned and operated by other businesses.

3.2 SLHs APP

All use of SLH's APP is based on volunteerism. No information is collected from SLHs APP.

3.3 facebook.com/torp

All use of facebook.com/torp is based on volunteerism. Facebook business pages are a solution where companies like SLH can create a profile. Other user profiles on Facebook can actively choose to follow the company page to access the information the company chooses to share. Other persons / user profiles do not leave information to us, but to Facebook as a platform via their own personal profiles. The site administrator has access to some information about our followers. Facebook only

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provides a demographic indication of the user group in relation to geographical location as well as age and gender.

3.4 Wireless Internet Solution - "free-WIFI-Torp"

All use of SLH's wireless internet solution is based on volunteerism. Public WIFI Meraki is SLH's wireless internet solution for visitors in the terminal. SLH collects and deals with unit name e.g. "Android-c0652642f5da5da3", amount of data used, operating system, MAC address, application e.g. "Netflix, Facebook, Secure Web" and time spent. SLH has access to log for 30 days. SLH's logs are stored on Cisco servers in Europe in Meraki Cloud Service. The traffic is logged for statistical and analytical purposes. In addition to SLH, Comtech AS has access to the logs in order to performe maintenance on the system. More information, go to: https://meraki.cisco.com/trust#gdpr .

3.5 Travel experience survey

SLH conducts travel surveys among passengers in the terminal. The purpose is to compile statistics that are used to improve and further develop TORP Sandefjord airport. SLH does not link the information directly to the user. The information is immediately sent electronically to Epinion Norge AS which is the data processor.

3.6 Customer surveys

SLH conducts customer surveys continuously throughout the year. Anonymous questionnaires on paper are collected, stored at SLH and sent once a month to TNC Canada Ltd which is the data processor.

4. Possibly identifiable information

If you provide Personal Information to SLH about others, you are responsible for ensuring that they the relevant persons have given their consent that SLH processes the Personal Information in compliance with this Privacy Policy and any other terms and conditions for the services in question. No more information is to be obtained by SLH, than what you have agreed to. SLH does not gather information about children under the age of 15 without the parent's consent.

4.1 SLH's newsletter

If you agree to receive SLH's newsletter, Personal Information will be named and email address is processed as long as you want to receive the newsletter. If you announcing that you will no longer receive the newsletter, the Personal Information will be deleted or anonymized and you will not receive additional newsletters from us. The SLH system user named MailChimp which is owned by The Rocket Science Group (RSG). Data is stored on RSG's servers in the United States.

SLH does not allow a third party to use your Personal Information for marketing purposes or communication purposes, unless you have agreed to this. Offers and others messages are posted by the tenant and advertiser in their own solution, but

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communicated via SLH's systems. Affiliates or advertisers do not have access to yours identifiable personal information.

4.2 Trip request on www.torp.no

If you voluntarily contact SLH's travel agency TORP Booking (TB), via our website, you are asked to provide personal information as name, e-mail, phone number. This data is sent as an e-mail to TB. Regardless of further correspondence with TB, the data is stored for a maximum of seven days at Coretrek AS which is the data processor of this information.

4.3 TB's further treatment trip request

Personal information that the customer has registered on www.torp.no cf. 4.2, is registered in SLH's CRM system (SuperOffice) for further handling of the customer's request. At first contact with the customer, TB obtains written consent from the customer to keep this data.

4.4 Parking

SLH has an agreement with APCOA PARKING Norway AS (APCOA) for the lease of our area for the operation of parking at Torp. APCOA is responsible for all processing of personal data in connection with parking at Torp is in accordance with Norwegian law. Information obtained in connection with the provision of parking services, will be deleted after the parking is paid and the deadline for complaints has expired. If you have Questions about your Personal Information you can contact APCOA at any time on personvernombud@apcoa.no or use the contact information provided in point 2.

Online booking

The online booking site is http://parkering.torp.no/ . There you can pre-book and pay for your parking online. The website is operated by APCOA. Relevant personal data for carrying out booking of your parking is stored by APCOA. Relevant personal information here is email, name, address, mobile number, information about the car such as registration number. The duration of the parking and how much you paid for the parking reservation is also collected. In order to receive newsletter subscription containing parking offers and information from SLH you must actively consent to it.

Signs Recognition

With camera registration (sign recognition) of entry and exit, information about when you pass is recorded. The information is deleted after 3 months. With camera registration of entry and exit, APCOA's factor supplier, Arvato Finance AS, send you an invoice (invoice fee applies) based on the information collected unless you have not already paid payment machine or on the mobile phone. Alternatively, payment is automatically deducted on your registered payment card. See the last paragraph of section 4.4 for more information.

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Payment for parking

In regards to online payment parking, this will usually be paid via card transactions. APCOA does not store any data relating to payment transactions. This is done by APCOA's card service providers such as VISA.

Payment information can also be entered on https://mobilparkering.com/ or the APP "Apcoa Mobile Parking" for automatic charging for APCOA's services. Data that is anonymised can be used for statistics and analyzes.

4.5 Check-in

There are several check in options: staffed check in, check-in on mobile phone/web or you can use self-service machines at the airport.

BB Computerteknikk AS (BBC) supplies machines for printing luggage tags (tagomat) in the check in area. The tagomate stores the name of the passenger in a file. The file is deleted after 3 days. The BBC can see the logs of maintenance and service. SITA CUTE is a portal that host the various airlines' Departure Control Services (DCS) and there is not stored any personal data on equipment placed at SLH. Passenger information is exchanged only between passengers and airlines. Widerøe Ground Handling AS (WGH), who through agreements with the airlines, processes all personal information.

You can contact your airline or WGH for more information on how they process your personal information.

4.6 Checking in luggage

If you are going to check in luggage this is done either by staffed counter or Self Service Bag Drop. In both cases, personal information must be provided. Your luggage is checked against the system of the airline you are traveling with so that the luggage can be linked to a valid reservation on the current date departing from Torp airport. The solution for Self Service Bag Drop is provided by the BBC and operated by WGH. The name of the passenger is stored in a file. The file is deleted after 3 days. The BBC can see the logs on maintenance and service. From your airline, WGH receives personal information used to process your luggage, and that the luggage tags are updated with active status for further handling.

Contact your airline or WGH for more information on how they process your personal information.

4.7 Control of travel documents

SLH controls travel documents on all passengers before entering the security check at Torp. This control is required by the Civil Aviation Authority to ensure that only people with valid travel documents pass the security check. Personal information collected is name and reference number of the ticket. Data from this control is stored on a dedicated server at SLH and used only to detect any deviations in relation to

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access to security restricted area or for checking the number of travelers corresponds to the expected number of the respective flights. All data is deleted within 30 days. Comtech AS is given access if software changes are needed.

4.8 Security control

The security check itself is performed by the supplier of security control services at Torp, Securitas Transport Aviation Security AS (STAS), commissioned by SLH. Any personal data given in the security check can be processed in STAS and/or SLH systems.

4.9 Camera monitoring

All safety restricted areas and associated areaa are monitored as required by the Civil Aviation Authority. All data is stored by SLH on dedicated servers. There are only security clearance personnel from SLH or STAS that has access to real-time data and limited playback.

Delivery of data from camera surveillance is only given out requested by the police, prosecuting authority, the Civil Aviation Authority or other authority. No data is stored longer than necessary in relation to the Civil Aviation Authority's requirements or other statutory requirements. The system is operated by SLH. Focus Security AS (FS), which is a system supplier, is provided access to SLH's servers for any upgrades and periodic maintenance of software.

4.10 Police and Customs Administration

Both the Police and the Customs Service are present at Torp. They use their own systems for their work, but may in some cases have limited access to instruct SLH to provide access to SLH's system. SLH may disclose personal information to the Police and/or the Customs Administration if that is legal. SLH also cooperates with other actors at Torp and may have to disclose personal information if legal requests are being put forward.

4.11 Duty Free

In the Duty Free stores on departure and arrival, Airport Retail Group AS operates the stores at Torp, a solution for checking valid travel documents based on customs requirements and quota information. The solution only retrieves flight information boarding card. No personal information is stored.

4.12 Assistance service

SLH is responsible for assistance service at Torp. The service is provided by WGH. To be able to deliver this service WGH needs information about you and your needs as well where and when you need assistance. The information WGH receives is the information you already have provided to your airline, and WGH uses this information only to deliver this service.

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4.13 Lost luggage

Lost checked luggage is handled by WGH on behalf of the airlines at Torp. SLH's Service Center receives other assets that are found in the terminal or on board the aircraft at Torp. Information on the found object is entered into our local interface and synchronized to the central database of MissingX.

It can be searched for Lost or Lost Items at https://www.missingx.com/ . Users can sign up at missing.com and search for lost assets. MissingX AS is data processor and describes their data processing here.

4.14 Instagram.com/torplufthavn

All use of instagram.com/torplufthavn is based on volunteering. Instagram business pages are a solution where companies can create a profile. Other user profiles on Instagram can actively choose to follow the company page to access the information the company chooses sharing. Other persons / user profiles therefore do not leave information to us, but to Instagram as a platform via their respective profiles. On Instagram it is possible for everyone to see who follows a particular profile.

4.15 Visitors to Torp

For visitors who need access to security restricted areas, it may be issued a visiting card. This issue is required by the Civil Aviation Authority and only the following data is used: name, company, date of birth and mobile number. This data is stored on the dedicated server at FS and is stored no longer than necessary in relation to the Civil Aviation Authority's requirements or other statutory requirements. Data is not used for other purposes and is only disclosed in a situation where it is required by the police, prosecuting authority, the Civil Aviation Authority or other authority.

4.16 Inquiries to SLH

If you make a request to SLH, such as an email or a letter, relevant Personal Data may be stored, such as name and e-mail and whatever information is given in the inquiry.

5. Where is the personal information processed?

The personal information SLH collects is processed in the EU / EEA. In a few cases, personal data is transferred and / or processed in data processors home country outside the EU / EEA.

Transfer of personal information to a data processor or subcontractor outside Norway will comply with the rules and requirements of the Personal Data Act.

SLH will secure data processing agreements with third parties who process personal information on behalf of SLH to ensure adequate security for all personal information.

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6. Legal basis for processing Personal Data

SLH can process personal data by law. If the specific personal data collected is not permitted by law, SLH is required to obtain the consent of you to do so.

7. How does SLH secure Personal Information?

Rules and procedures have been established for the protection of privacy in accordance with the Personal Data Act. SLH will use all reasonable precautions to Ensure that our employees, data processors, and third parties act in accordance with these guidelines and our obligations under the privacy laws.

8. Insight into and deletion of Personal Information

SLH does not process and store information about you longer than necessary or required. You have the right to access your own information at any given time. If the information is incorrect, incomplete or there is no reason to have them, you can ask SLH to delete the information. See contact information in point 2.

You can also withdraw your consent at any time and for any reason. The personal information about you will then immediately be deleted or anonymized. You also have the right to ask SLH to limit the processing of personal information or to oppose to SLH processing personal information about you.

You are entitled to data portability of all information SLH has collected about you.

You have the right to request information about which personal information SLH entitles. Such requests must be made in accordance with paragraph 2.

9. Complaints

If you believe that SLH's processing of personal data does not corresponds with the description in this Privacy Policy or that SLH in other ways violates privacy laws, you can complain to the Data Inspectorate. You can find contact information here: www.datatilsynet.no .

10. Changes to the privacy statement

SLH claims the right to change or update this Privacy Policy. All changes are valid from the time they are posted and will include information collected from that particular date as well as existing information collected at an earlier date. You can find out when these policies were last revised by looking at the date change/approval in the document header.