

Red Pass holders Privacy Notice

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1. Introduction

This Privacy Notice is in addition to the Employee Privacy Notice. It applies to current and former employees, workers, agency workers, consultants, interns, partners and directors who have been issued with Red ID Passes. The roles typically requiring these passes are;

FBO team
Airport Operations Team
Fuel Team
Fire Team
Aviation Security Team

Marshall is the “data controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information. We are required by law to notify you of the information contained in this Red Passholders Privacy Notice.

It is important that you retain and read this document.

We may update this document at any time and the latest version will always be available on the Marshall Privacy Notice web page but we will send you a new Red Passholders Privacy Notice if any significant changes are made.

2. Responsibilities

- 2.1 The Security Compliance & Jet Centre Manager is responsible for ensuring that this notice is made available to data subjects requiring a red pass prior to Marshall deploying them.
- 2.2 All Employees/Staff of Marshall who interact with the referred data subjects are responsible for ensuring that this notice is drawn to their attention.

3. Privacy Notice

3.1 We are Marshall Group.

Please refer to your main privacy notice for full details of companies covered by this title.

Our Data Privacy Manager can be contacted directly here:

- DataPrivacyManager@Marshalladg.com (Marshall Data Privacy Manager)
01223 373206

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Any queries referring to the Red Passholders Privacy Notice should be referred to the Security Compliance & Jet Centre Manager in the first instance.

3.2 Types of Personal data:

Is any data that could identify a living individual. Please refer to your Employee Privacy Notice for full details of definitions

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3.3 Data Collected

We will collect and process (on behalf of the UK Government Home Office) the following personal data about you

The dataset that will be shared with HO will comprise of the below table. Additional data fields may be shared, if that data is gathered as part of the Airport or Crew Identity Card (AIC / CIC) issuing process and agreed in writing between the airport/air carrier and the Home Office (HO). Green fields are those that are mandated to be shared with the HO.

Information group	Explanation	Generic field name	CAA Direction – mandatory?
Unique database reference numbers	Any unique database reference numbers relating to individual records, of a pass or a person	Unique database record reference number (for AIC / CIC)	Y
		Person reference number	
Full name & previous name	Any and all names relating to the applicant / pass holder	Last name / Surname	Y
		First name / Forename	Y
		Middle names	Y (if applicable)
		Previous surname	
		Other names	Y (if applicable)
Date of Birth	Date of birth	Date of birth	Y
Place of Birth		Place of birth	
	Information relating to the place of birth of an individual	Country of birth	
Nationality	Self-explanatory	Nationality	Y
Gender	Self-explanatory	Gender	
Title	Self-explanatory	Title	
Car registration plate	The registration plate of the pass holder or applicant	Vehicle registration number	
Current address information	Current full personal address (not business address)	Residential address line 1	Y
		Residential address line 2	Y

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	and date from which they lived there	Residential address line 3	Y
		Residential address line 4	Y
		Residential address line 5	Y
		Residential address line 6	Y
		Current address date from	
		Current Address indicator	
Previous address information	Previous full personal address (not business address) and date from which they lived there	1st line of address	
		2nd line of address	
		3rd line of address	
		4th line of address	
		5th line of address	
		Previous postcode	
		Previous address date from	
All contact details	All digital forms of communications provided for the individual	Primary telephone / mobile number	Y (if applicable)
		Phone country code	
		Primary Phone type	
		Secondary telephone / mobile number	
		Email address	Y (if applicable)

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Identification related information	Information relating to the individual that they used to prove identity and right to work	National Insurance number	Y (if applicable)
		Passport number	Y (if applicable) - see comment
		Passport issue date	
		Passport expiry date	
		Passport issuing country	Y (if applicable) - see comment
		UK Driving Licence number	Y (if applicable) - see comment
		UK Driving Licence issue date	
		UK Driving Licence expiry date	
		National Identity number	Y (if applicable) - see comment
		National Identity issue date	
		National Identity expiry date	
		National Identity issuing country	Y (if applicable) - see comment
		Other Identification number	
		Other Identification type	
		Other Identification issue date	
Other Identification expiry date			
Other Identification issuing country			
Clearance information	Information relating to any security clearances held by the individual or any	National security clearance type	
		National security clearance reference number	

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	CRC checks carried out	National security clearance issue date	
		National security clearance expiry date	
		UK Security Vetting Accreditation Check clearance number	Y (if applicable)
		UK Security Vetting Accreditation Check clearance issue date	Y (if applicable)
		UK Security Vetting Accreditation Check clearance expiry date	
		UK Security Vetting clearance subject ID number	
		UK Security Vetting Accreditation Check sponsor number	Y (if applicable)
Criminal record check	Data pertaining to relevant criminal record check information for AIC applicant	CRC obtained	
		Overseas CRC	
		CRC overseas country of issue	
Visa information	Information relating to VISA's allowing them to work	Visa obtained indicator	
		Visa expiry date	
		Visa issued date	
		Visa ID number	
		Visa type	
Airport and crew identity card details and access information	Information relevant to the individuals pass and the areas of access it has access to and the reason why the individual may require access to this area	Card type	
		Card format code	
		Card format	
		Pass reference	
		Previous pass reference	
		Card serial number	

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		Tools of trade pass	
		Tools of trade	
		Aircrew pass	
		Zone access code	
		Zone access name	
		Parking Exempt pass	
		PAX Mode	
		Incident Response Team Pass	
		Incident Response Team Reference	
		Card ID Number	
AIC/CIC status	Information relating to the status of the	Pass start date	Y
		Pass expiry date	Y
	pass and whether it is active or not, and why	Reissue date	
		Parked pass	
		Parked duration	
		Parked reason	
		Last activation date and time	
		Stolen pass	
		Stolen reference number	
		Stolen reported	
		AIC / CIC card status	Y
AIC/CIC issuer/authorisation information	Information relating to the authorisation of the pass and its issuing	Issued by	
		Issue date	
		Authorised Signatory	
Previous AIC/CIC pass information	Information relating to previous passes on record for the individual	Other pass owned	
		Previous pass owned	
		Previous pass expiry date	

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		Previous pass type	
Employment related information	All information relating to the individual's employment in relation to their role at the airport / airline	Job title	
		Department	
		Company name	
		Company prefix/code	
		Previous company name	
		Previous company prefix/code	
		Position end date	
		Position start date	
AIC/CIC application number	Application number specific to the application for an AIC/CIC being made	Application id	
		Application Completion Date	
		Application Status	
<p>Note additional data fields may be shared if that data is gathered as part of the AIC/CIC issuing process and agreed in writing between the airport/air carrier and the HO. Through consultation with government agencies the listed data fields have been established as those required in order to identify a Person of Interest (POI). The range and volume of data will be reviewed on an annual basis to ensure it is proportionate for the given purpose. Our data will cover the UK and crown dependencies as well as overseas pass holders for those working for the UK airports or air carriers.</p>			

3.4 Special Category Data collected

As part of the gathering of the data referred to above the following special category data may also be processed;

- Race or ethnic origin (including nationality)
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data or biometric data for the purpose of uniquely identifying individuals
- Health
- Sexual orientation or details of the sex life of an individual

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Criminal records may also be processed.

3.5 The personal data that will be collected will be used for the following purpose:

of safeguarding national security and the prevention and detection of crime. In particular, this may include:

- Ensuring that an AIC/CIC holder has not been convicted of a disqualifying offence between AIC/CIC renewals; and
- Assessing whether intelligence about an individual suggests that there is a criminal or national security risk in allowing that individual to hold an AIC/CIC.

The primary purpose for processing of the data is national security the UK Government Home Office will be processing under the applied GDPR regime (Chapter 3 of Part 2 of the Data Protection Act 2018 read alongside the GDPR). They are still collecting data for the prevention and detection of crime, but they will be transferring this out to the police and NCA to do the processing on their systems. The HO would not be carrying out the processing for law enforcement purposes directly, so Part 3 of the DPA 2018 would not apply.

3.6 Legal Basis for processing your data

Marshall's legal basis for processing your data is: CONTRACTUAL

The HO legal basis for processing your data is: PERFORMANCE OF PUBLIC TASK

We are legally obliged to provide this information to the UK Government Home Office.

If processing special category data (see 3.3 above) the condition for processing the data will be: PUBLIC INTEREST.

It is necessary for the HO to process the Data in order to exercise the Crown's common law function of protecting the public.

3.7 Disclosure

The HO will share this data with Government Agencies for the purposes of safeguarding national security and/or for the prevention and detection of crime. The legal basis for the HO sharing this data with the following agencies are outlined below:

The Intelligence Agencies

Under section 19(1) of the Counter-Terrorism Act 2008 a person may disclose information to any of the intelligence services for the purpose of the exercise by that service of any of its functions.

The National Crime Agency (NCA)

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Under section 7(1) of the Crime and Courts Act 2013 a person may disclose information to the NCA if the disclosure is made for the purposes of the exercise of any NCA functions.

The Police

Under section 115(1) of the Crime and Disorder Act 1998 a person who would not have power to disclose information to a relevant authority (or a person acting on behalf of such an authority) does have the power to do so where the disclosure is necessary or expedient for the purposes of any provision of the Crime and Disorder Act 1998.

The HO, as a Government department headed by a Minister of the Crown, also has common law powers to share the data with the police for the prevention and detection of crime.

3.8 Transferring personal data to other countries

In regard to this Privacy Notice your data will not be transferred outside of the European Economic Area (EEA)

3.9 Retention period

The HO will retain the AIC/CIC data only for the validity period of the AIC/CIC plus an additional year. This is to ensure sufficient time for all relevant records to be deleted after HO finds out that the AIC/CIC has expired. Where the AIC/CIC has been withdrawn for reasons of national security or the prevention and detection of crime the retention period of the data will be six years from the date of termination of the AIC/CIC. Pass application data which we will retain for a flat six-year period.

At the end of each retention period, the HO will arrange for the secure destruction or deletion of its copies of the data, in accordance with the requirements of the Data Protection legislation.

All UK and EU organisations involved will meet the GDPR requirements by law.

3.10 Your rights as a data subject

At any point while we or the HO are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that is held about you.
- Right of rectification – you have a right to ask for data that is held about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data that is held about you to be erased, if there is no overriding legal reason to keep it.

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- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data held about you transferred to another organisation. Please note in regard to the data referred to in this Privacy notice, the right of portability cannot be applied..
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene. Please note in regard to the data referred to in this Privacy notice, automated processing is not used.
- in the event that Marshall or the HO refuses your request under rights of access, you will be provided with a reason as to why.
- Where the legal basis for the processing of PII data is 'consent', you have the right to withdraw that consent at any time and the record will be deleted where there is no overriding legal basis to keep it. Please note in regard to the data referred to in this Privacy notice, the legal basis of CONSENT is not used.

You have the right to complain as outlined in clause 3.11 below.

All of your rights identified above apply to any third party (as stated above) should they be involved in the processing of your personal data.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, by emailing DataPrivacyManager@MarshallADG.com or by sending written correspondence to The Data Privacy Manager, Marshall, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a subject access request by completing the organisation's Subject Access Request Form on the Marshall Privacy Notice web page

3.11 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall's Data Privacy Manager, by emailing DataPrivacyManager@MarshallADG.com or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

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The details for each of these contacts are:

	Data Privacy Manager	Supervisory Authority
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall, Airport House, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	DataPrivacyManager@MarshallADG.com	https://ico.org.uk/global/contact-us/email/
Telephone:	01223 373206	03031231113
Website		https://ico.org.uk/concerns/

The recommended method of communication to the ICO is via their website

Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Issuing of Document	Data Privacy Manager	April 2022
1.1	Reviewed and hyperlinks removed	Head of Information Governance	Dec 2022

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