

# Bordeaux Airport Privacy Policy

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## 1. Introduction

### a. Structure of this policy

This policy for the protection of personal data has been drawn up in accordance with the G29's Code of Good Practice ([Guidelines on transparency under Regulation 2016/679, 29 November 2017](#)<sup>1</sup>).

The document structure proposed in the guidelines has been supplemented with information considered to be useful, particularly as regards our website and processes for which direct information is difficult to obtain.

### b. Version

The current policy is the first published version (1.0).

### c. Aim of this policy document

In the context of the use of its airport, its services and particularly the services available on its website and its mobile site, Bordeaux-Mérignac Airport (SA ADBM), as the data processing manager, is liable to collect and process its users' personal data.

SA ADBM is particularly concerned with conforming to the rules protecting the privacy of its passengers, visitors to its website and mobile site, its commercial partners, collaborators and sub-contractors. Any processing of personal data carried out in the context of the accessible services conforms to the applicable local regulations concerning the protection of personal data and in particular the provisions of the amended Data Protection Law of 6 January 1978 and the General Data Protection Regulation (EU Regulation 2016/679) or "GDPR".

To ensure the correct application of these rules, SA ADBM has appointed a data protection officer who is the main point of contact with the French Data Protection Authority (Commission Nationale de l'Informatique et des Libertés - CNIL). ADBM has also established appropriate internal procedures in order to make its employees aware of these rules and to ensure that they are respected within the organisation.

### d. Field of application

This data protection policy applies to any and all data processing for which ADBM is considered to be responsible or jointly responsible.

### e. Personal data protection principles applied

SA ADBM's data protection strategy is based on several founding principles:

- *Privacy by design / secure by default*: the draft procedures and methods implemented by SA ADBM have been updated in order to incorporate the expression of specific needs concerning the security of information and the protection of personal data,
- *Training and awareness*: the producers and users of the personal data processed by us are trained in and made aware of these subjects on a regular basis. Different documents have been produced to this effect (including a Code of Good Conduct).
- *Checks and audits*: in order to ensure that the level of compliance remains consistent over time, a regular audit process has been established.
- *Supervision of sub-contractors*: specific security and compliance clauses have been drawn up and contractualised with all third parties involved in processing personal data.

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<sup>1</sup> "Good practice in relation to transparency" [https://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=622227](https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=622227)

## 2. Body responsible for data processing

Bordeaux-Merignac Airport is a French *société anonyme* (public limited company) (SA ADBM, hereafter referred to as ADBM) with a Board of Directors, a Supervisory Board and capital of €148,000.

SA ADBM, a public company governed by private law, has a 30-year concession to operate the airport at the Bordeaux-Merignac site. ADBM performs several dozen different types of data-processing operations in order to ensure the secure operation and development this airport.

## 3. Information relating to the data that we collect about you

ADBM undertakes to provide clear and concise information that complies with the regulatory requirements concerning each personal data-processing operation. The aim of this policy is to provide general information about the main principles underlying the processing of these data by ADBM, with specific and precise information also being provided for each processing operation.

To this end, the processing operations have been mapped out and a processing register has been drawn up and kept up to date.

Some of the personal data-processing operations carried out by Bordeaux Airport have complex requirements concerning the information to be given to individuals. In order to ensure total transparency, we have chosen to present these information notices in our data protection policy.

The following table summarises the processing operations for which information is difficult to provide at the time of collection:

Process name	Process description	Information
Passenger management in the air terminal	This system enables the airport management to monitor passengers in real time and determine where they are. This enables us to allocate appropriate resources in relation to the number of passengers and thus deliver the expected quality of service. This system also enables us to improve the level of security in the departure halls.	<p>Duration of data conservation: 5 days</p> <p>Reason for processing: analysis of passenger flows to optimise material and human resources in order to reduce waiting time before boarding.</p> <p>Legal basis: legitimate interest of the data processing manager</p> <p>Recipients: ADBM's Technical Operations Department and service providers responsible for the maintenance of the equipment used.</p> <p>The data are stored on ADBM's premises: there is no data transfer or sharing.</p>
Fire brigade interventions	The airport fire brigade may come to the assistance of people who are taken ill on the airport premises. In this event, they will collect personal data about the people they treat.	<p>Duration of data conservation: 5 years</p> <p>Reason for processing: having sufficient data to ensure the rapid provision of assistance to people with health problems.</p> <p>Legal basis: safeguarding the vital interests of the people concerned.</p> <p>Recipients: the airport fire brigade, the security department and the various emergency services that may intervene at the airport.</p> <p>These data are stored on ADBM's premises. If necessary, the data are transmitted to third parties involved in treating the user.</p>
Incident management	If an incident occurs at the airport, ADBM may need to process the personal data of the different individuals who may be involved in the resolving the incident (victims, witnesses, etc..)	<p>Duration of data conservation: Archived for 10 years from the closure of the case.</p> <p>Reason for processing: having sufficient data to facilitate the investigation of incidents.</p> <p>Legal basis: legitimate interest of the data processing</p>

		<p>manager</p> <p>Recipient: ADBM legal department and any third party considered relevant to the case.</p> <p>These data are stored on ADBM's premises. Where necessary, the information may be transmitted to third parties involved in dealing with the aftermath of the incident. Such data transmissions will be the subject of specific security measures.</p>
Recording of telephone calls to the control room	Incoming telephone calls to the control room are recorded in order to ensure their traceability, A pre-recorded information message is played.	<p>Duration of data conservation: 30 days</p> <p>Reason for processing: to enable calls to be accurately traced in the case of an incident</p> <p>Legal basis: legitimate interest of the data processing manager</p> <p>Recipients: the control room manager, the technical manager responsible for the installed system and, where necessary, the service provider in charge of maintenance.</p> <p>The data are stored on ADBM's premises: there is no data transfer or sharing.</p>

#### 4. Reasons for the processing operations carried out

The various processing operations have been comprehensively mapped out. A precise reason has been determined for each one and these are explained in the respective information notices. We undertake to process the data in accordance with the information provided whenever the data is collected.

Since certain sources of personal data may be used for several processing operations, the different reasons for each processing operation are explained where necessary.

#### 5. Legality of processing operations

Each processing operation carried out is based on a legality criterion that is identified and specified in the information notices. In cases of data collection based on consent, ADBM undertakes to obtain such consent in a clear, explicit and precise manner (active opt-in principle).

#### 6. Recipients of data

By default, the different departments of ADBM are the sole recipients of the personal data that we collect and process. However, for technical reasons, data may be transmitted to third parties, in particular:

- Airlines with flights that take off from or land at Bordeaux,
- Service providers working for in the entire airport, or in a part of it,
- Sub-contractors carrying out operations on our behalf.

Where data are transmitted to one or more third parties, the characteristics of such transfers are explained in the information notice for the processing operation in question.

Any data collected for commercial purposes are processed and used exclusively by ADBM. They are never transferred, either free of charge or against payment, to any third parties.

#### 7. Transfer outside the EU

As far as possible, ADBM does not transfer personal data outside the European Union. If it should do so, the information notice for the relevant processing operation shall state this explicitly and a legal framework shall be defined with the recipient to ensure the continuity of your personal data protection.

## 8. Data conservation period:

For each processing operation, the information notices clearly state the applicable data conservation periods. It should be noted that in the majority of cases, two types of data are processed:

- Administrative data, which provide all the information required to identify individuals (surname, first name, postal address, etc.)
- Transaction data, which give details of information exchanged during a processing operation.

When a conservation period is defined, it is applied as follows:

- The transaction data are conserved strictly for the defined time period. Anonymisation and/or deletion processes are carried out regularly.
- Administrative data are conserved for as long as transactions are carried out. If no transaction has been carried out during the conservation period defined for the processing operation, the administrative data will be deleted.

In every case, all data relating to individuals will be deleted if they choose to exercise their right to delete data.

## 9. Your rights relating to your personal data

In accordance with the General Data Protection Regulation n° 2016/679, you have the right of access, correction, opposition, limitation, deletion and portability of data relating to you. You also have the right to lodge a complaint with the CNIL if you consider that the manner in which we process your personal data fails to comply with the law.

To exercise these rights, you can contact the ADBM's Data Protection Officer (DPO) using the methods set out in paragraph 11 (ADBM's DPO contact details) of this document.

## 10. Management of your personal data on our website

Address of our website: <https://www.bordeaux.aeroport.fr>

### a. Types of forms

#### i. B2C information forms

The information collected on the website's information forms is stored in a computer file (hosted in Europe) by ADBM (the company that manages Bordeaux-Mérignac Airport) for information purposes. It is kept on file for a period of five years from the date of consent to its collection and it is only used by ADBM employees.

The forms in question include: contact with the parking department, contact with the environment department, speculative job applications, etc. (This list is non-exhaustive and is given for information only).

#### ii. B2B information forms

The information collected from the website's information forms is stored in an electronic file (hosted in Europe) by ADBM (the company that manages Bordeaux-Mérignac Airport) for information purposes. It is kept on file for a period of ten years from the date of consent to its collection and it is only used by ADBM employees.

The forms in question include: orders for travel agents' resources, hiring of meeting rooms, requests for filming on the site, etc. (This list is non-exhaustive and is given for information only).

### iii. B2C commercial forms

The information collected on the website's commercial forms is stored in a computer file (hosted in Europe) by ADBM (the company that manages Bordeaux-Mérignac Airport) for advertising purposes. It is kept for a period of five years from the date of consent to its collection and it is only used by ADBM's sales teams.

The forms in question include: subscription to the Bordeaux Airport Newsletter, subscription to Bordeaux Airport's "Envol" magazine, etc. (This list is non-exhaustive and is given for information only).

### iv. B2C transaction forms

The information collected on the website's information forms is stored in a computer file (hosted in Europe) by ADBM (the company that manages Bordeaux-Mérignac Airport) for the purposes of developing customer loyalty. It is kept for a period of five years from the date of consent to its collection and it is only used by ADBM's sales teams.

The forms in question include: car park booking, booking of the Hall A lounge, etc. (This list is non-exhaustive and is given for information only).

## b. Cookies

Our site uses cookies, which help us to facilitate your access to the services we offer. Cookies are information files that a website may transfer to your browser and which are subsequently stored on your computer system.

These cookies are implemented in accordance with article 32-II of the law of 6 January 1978, amended by decree n° 2011-1012 of 24 August 2011 transposing EC directive 2009/136 into French law.

Three types of cookie may be found on the site "https://www.bordeaux.aeroport.fr":

1. Technical cookies enable the site to operate nominatively. They are not deposited by default and cannot be deactivated.
2. Audience cookies enable us to measure the use of our platforms and to facilitate their adaptation to your requirements. In accordance with the CNIL's recommendations on the subject, we do not seek your consent to deposit these cookies because we have configured them in such a way that they can only be used for audience measurement. You can deactivate these cookies if you wish.
3. Tracking cookies firstly enable us to improve the visibility of the site (e.g. by sharing on social networks). Secondly, they can be used to present advertisements – either our own or by third parties, depending on your actions. In accordance with the CNIL's recommendations on the subject, these cookies are not deposited without your prior consent and they can be deactivated at any time.

The lifespan for all types of cookies is **13 months (on a non-rolling basis)**.

To facilitate their personalisation, a specific cookie management banner has been implemented and is available throughout our website via the "Cookie management" link at the bottom of the page, where you will find all the cookies that have been deposited.

In addition, we would like to inform you that you can block these cookies by configuring your computer using the parameters of your Internet browser according to the above-mentioned methods and/or by one of several configuration mechanisms directly available in your Internet browser (Chrome, Firefox, Internet Explorer, etc.). You will find all the necessary details on the CNIL website in the "Tools for optimal cookie management" ("[Cookies, les outils pour mieux les maitriser](https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser)"<sup>2</sup>) section.

It is important to note that if you block the saving of all cookies on your computer, or if you delete those that are stored, you will no longer be able to use all the functions that are required for browsing certain parts of our website.

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<sup>2</sup> CNIL site, section: "Cookies, les outils pour mieux les maitriser" : <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>

This would be the case if you tried to obtain access to content or services that require you to identify yourself, for example. It would also be the case if we – or our service-providers – for technical compatibility purposes, were unable to recognise the type of browser used by your computer, its language and display parameters or the country in which your computer appears to be connected to the Internet.

If applicable, we decline any liability for consequences related to the downgraded operation of our services resulting from our inability to save or consult the cookies that are required for their operation and that you have refused or deleted.

Finally, if our website site redirects users to a third-party website, we refer you to the cookie management policy of the website in question.

### **c. Newsletter**

To enable us to inform you of our commercial offers, and those of our partners, we give you the opportunity to subscribe to our newsletter. The data gathered are stored in our CRM system and kept on file for a period of five years after your last subscription.

It is important to note that you can unsubscribe from our newsletter at any time. To do this, you can:

- Use the unsubscribe link at the end of each edition of the newsletter.
- Send a request to our DPO.

## **11. Contact details for the ADBM DPO**

If you have any questions concerning your personal data, you can contact our Data Protection Officer (DPO):

- by email at the following address: [dpo@bordeaux.aeroport.fr](mailto:dpo@bordeaux.aeroport.fr)
- by post at the following address: DPO, Aéroport de Bordeaux  
Cidex 40  
33700 Mérignac  
France