



Privacy Notice for Wi-Fi Services

Last Updated: March 2019

This privacy notice tells you what to expect when Heathrow Airport Limited (Heathrow) collects personal information about you when you use the Heathrow Wi-Fi service. Heathrow is committed to protecting your personal information when you use Heathrow services. Whenever you provide such information we will only use your information in line with all applicable data protection laws, including the General Data Protection Regulation (GDPR). Your information will be kept in a secure environment and access to it will be restricted according to the 'need to know' principle.

What information will we collect about you?

When you use Heathrow Wi-Fi, we will collect the following information about you:

- Salutation
- Name
- Email address
- Heathrow Rewards login credentials (if you are a Heathrow Rewards member)
- Social media details (if you choose to login via social media)
- Location data (which terminal you're travelling through)

Heathrow collects information about how you use the Heathrow Wi-Fi service via our website and the device(s) that you use to access the service. This includes collecting unique online identifiers such as IP addresses, which are numbers that uniquely identify a specific computer or other network device on the internet. For more information, see our section on 'cookies' below.

How will Heathrow use the information it collects about me?

Heathrow will use your personal data for a number of purposes including the following:

Use of data	Purpose	Justification
To provide you with the Heathrow Wi-Fi service	Contract	We will be unable to form a contract and provide you with Heathrow's Wi-Fi Services without collecting and using your personal data.
To send you marketing communications about Heathrow products and services.	Legitimate Interests	This is a real-time email communication sent to you containing the latest news and offers at Heathrow once you are connected. If you use the Heathrow Wi-Fi service on a regular basis, we may also send you a monthly communication. Where you provide your social media details, we may contact you through the related channel. The content we publish may talk about the following topics: News, competitions, retail partners and partner content. Please note that this is a non-exhaustive list. We may or may not follow your account and if we do follow you, this does not imply endorsement of any kind.

		<p>We do not accept official correspondence through social media. Use of social media is subject to the respective social media provider's privacy notices and you can control your account through your security and privacy settings.</p> <p>We will use your location data to ensure our marketing communications are relevant to the terminal you are travelling through if you have provided clear consent to receive these communications.</p> <p>We will only do this where you give us your clear consent to do so.</p>
<p>We may also match the data we collect with other data that we hold about you if you have used Heathrow products and services before.</p>	<p>Legitimate Interests</p>	<p>We have a legitimate business interest for your personal data to be used for this specific purpose. We may also match the data we collect with other data that we hold about you if you have used Heathrow products and services before. We do this to build up a picture of your personal preferences and understand how you use Heathrow products and services. This enables us to deliver a richer customer experience and ensures we only send relevant communications to you.</p>

You are always in control of how we use your personal data and can opt out of marketing communications during and after the booking process. You can change your marketing preferences at any time or unsubscribe from Heathrow Airport marketing communications by visiting 'My Account' or by clicking 'Unsubscribe' on the footer of a Heathrow Airport marketing email. You have the right to object to this processing which you can exercise by contacting privacy@heathrow.com. Please note that if you object, this may affect our ability to send personalised marketing communications to you.

Your information will be handled and used by the following recipients in order to deliver the Heathrow Service booked:

- Authorised Heathrow staff
- Virgin Media who deliver the Heathrow Wi-Fi service
- Boingo who deliver the Heathrow Wi-Fi service
- Acxiom Limited, our trusted data partner
- Customer service agents employed by Sitel Group who work on behalf of Heathrow

We will keep your information within Heathrow and our trusted third parties except where disclosure is required by law, for example to government bodies and law enforcement agencies.

Your personal data is processed in the US and UK.

How long will Heathrow keep my information?

Your account information will be retained for a period of six months from the date of your last Wi-Fi login at which point all of your personal details are removed from our systems.

Your personal details for marketing communications will be retained for a period of three years from the date of your last interaction with the marketing communication (i.e. opening an email or clicking on a link within the email) at which point all of your personal details is removed from our systems.

Where you tell us that you no longer wish to receive marketing messages about Heathrow products and services, we will keep this information about you until you tell us otherwise. This is to ensure that we don't send you any further marketing communications in error.

What rights do I have over my personal data?

Under the General Data Protection Regulation, you have the right to:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your information where this is justified
- Object to the processing of your information where this is justified
- Data portability

To exercise your rights, please contact the Heathrow Data Protection Officer using the following contact details:

Data Protection Officer
Heathrow Airport Limited
The Compass Centre
Nelson Road
Hounslow
Middlesex
TW6 2GW
Email: privacy@heathrow.com

What if I find your response unsatisfactory?

Should you find our response unsatisfactory, you have the right to lodge a complaint with the supervisory authority – the Independent Commissioner's Office (ICO). You can find more information on the ICO website at <https://ico.org.uk/concerns/> regarding the complaints process.

Privacy & Cookies

Cookies are small text files which are stored on your computer when you visit certain web pages. At Heathrow we use cookies to understand how our sites are used which helps us to improve your overall online experience. Some of the cookies we use are necessary for some of our sites to work whilst other cookies are used to provide tailored advertising by trusted third parties. To find out more about cookies, visit www.aboutcookies.org

The different types of cookies we use

Heathrow use the following categories of cookies on our websites:

Strictly necessary – These cookies are essential for certain features of our websites to work for example when you make payments for car parking. These cookies do not record identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services you have asked for cannot be provided.

Performance - These cookies are used to collect anonymous information about how you use our websites. This information is used to help us improve our websites and understand how effective our adverts are. In some case we use trusted third parties to collect this information for us which may include recording your use of our websites but they only use the information for the purposes explained. By using our websites, you agree that we can place these types of cookies on your device. You have the right to object from being recorded on our websites by clicking [here](#).

Functionality - These cookies are used to provide services or remember settings to enhance your visit for example text size or other preferences. The information these cookies collect is anonymous and does not enable us to track your browsing activity on other websites. By using our websites, you agree that we can place these types of cookies on your device.

Targeting and Advertising – These cookies are used by trusted third parties to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. Information contained in these cookies is anonymous and doesn't contain your personal information. To find out more about cookies used for targeting and advertising follow www.youronlinechoices.com and www.networkadvertising.org or contact us at website_feedback@heathrow.com for further information about the trusted third parties we use.

Managing cookies

If you'd prefer to restrict, block or delete cookies from Heathrow and our third party advertisers, or any other website, you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser to learn how to change your cookie preferences. If you choose to disable all cookies we cannot guarantee the performance of our websites and some features may not work as expected.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We will keep this privacy notice under regular review and we will place any updates here. At the start of this privacy notice, we will tell you when it was last updated.

- July 2018: Account information retention period updated from two years to six months.
- February 2019: Terms and Conditions removed, information will we collect about you, who we share your details with to fulfil the Wi-Fi service and how we use the data.