

Farnborough Airport Consultative Committee – *Actions under Item 2 of November Meeting*

The following letter extract was received from TAG's appointed independent advisor on implementation of GDPR concerning the withholding of complainant personal data:

Hello Miles

Further to your enquiry regarding the Farnborough Aerodrome Consultative Committee (FACC), please see my response regarding releasing personal data which can be forwarded to the committee.

The General Data Protection Regulations (GDPR) came into force on the 25 May 2018, GDPR extends the data rights of individuals (data subjects), and places a range of new obligations on organisations that process EU residents' personal data.

TAG Farnborough Airport Ltd has a legal obligation to comply with GDPR and ensure that the six data principles are adhered to along with the principle of accountability (the latter demonstrates and evidences responsibility and compliance).

GRCI Law acts as the external Data Protection Officer (DPO) for TAG Farnborough and is working with the company to ensure GDPR compliance. I understand that the committee has expressed their concern that they no longer receive reports containing details of individuals who have made a formal complaint to the airport relating to noise etc.. The committee now receive these reports with only the location i.e. town/city and the nature of the complaint along with a postcode map. These reports are published on the FACC website and publicly available.

It is my opinion that the recent decision of TAG Farnborough Airport to anonymise the personal data of the complainants by virtue of removing all personal identifiers with the exception of the town was the correct decision, furthermore the recent request to provide the name of road in which a complainant lives should be not be provided in these reports. The postcode map should not disclose the individual's postcode but be generic such as GU14.

Personal data includes information relating to natural persons (individual) who can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information. GDPR provides a non-exhaustive list of identifiers, including name and location data.

In light of this advice TAG Farnborough Airport will continue to withhold personal data, however it is recognised that there is need to support communication between complainants and the Civic Groups and local council representatives.

It is proposed that each representative who wishes to participate, provides written confirmation (of an official nature) of their wish to have their contact details published on our company website in an appropriate location. TFA will then reference this location as a hyperlink on all complaint responses, submitted in accordance with our published Complaints Charter. A print out of the web page can be offered to anyone without internet access.

Miles Thomas, Environment Manager

11-02-19