

Avinor guidelines

PRIVACY, COOKIES AND MARKETING

Updated 1 March 2016

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These guidelines for privacy, cookies and marketing ("the Guidelines") apply for the collection and use of personal data on:

- Avinor's WiFi network
- Avinor's website; www.avinor.no
- Avinor's various digital services
- Avinor's digital travel companion EarlyBird <https://earlybird.avinor.no>

Avinor AS ("Avinor") owns the website www.avinor.no, the networks at Avinor's airports in Norway, Avinor's applications and Avinor's digital travel companion EarlyBird (link). We want you to have peace of mind when you use the network, our website, the applications and EarlyBird. This statement concerns how Avinor ensures your privacy and how we collect and use information in accordance with Norwegian law.

Contact information:

If you have questions related to these guidelines or how we process personal data, please contact us at post@avinor.no or send a letter to Avinor AS, attn.: Data Protection Official Mari Wiker P.O. Box 150, 2061 Gardermoen.

1. PERSON RESPONSIBLE FOR PROCESSING DATA

Avinor, represented by the CEO, is responsible for the processing of personal data.

2. PROCESSING OF PERSONAL DATA

All use of Avinor's WiFi network, website, applications and EarlyBird is voluntary. The personal data Avinor processes concerning you is described in these Guidelines, see Items 3 and 4. We also process non-identifiable information about the users of our networks, websites and applications. The purpose of this is to prepare statistics that we use to improve and further develop the services on our websites, etc. We do not connect the information directly to you as a user. See more about web analysis and cookies in Item 6.

Avinor's websites and applications may link to websites or applications that are owned and operated by other enterprises. We do not have access to and do not process personal data that is collected by these websites. Neither is Avinor responsible for the content or processing of personal data on other websites or applications.

3. MORE DETAILS CONCERNING AVINOR'S DIGITAL TRAVEL COMPANION (EARLYBIRD)

Avinor's digital travel companion (EarlyBird) is a digital service that will provide you with tailored travel information and a better experience at Avinor's airports in Norway. The purpose is to give you relevant, tailored and updated information about your journey, such as your check-in counter, gate information and any changes to your departure time/gate based on where you are and where you are going. EarlyBird also provides you with relevant and bespoke services or products from Avinor or Avinor's partners, such as parking, shops, restaurants etc.

You can become an EarlyBird user either through the websites OSL.no/EarlyBird, EarlyBird.avinor.no or by being routed through Avinor's other digital channels, including Avinor's applications. If you want to receive relevant and tailored information and offers through EarlyBird, Avinor needs to collect and process information about you, for example your name, address, telephone number, flight number and other non-sensitive personal data such as demographic data, history and preferences.

In EarlyBird, you can decide yourself how much travel information you want to add beyond flight information.

All processing of personal data takes place in line with Norwegian law and is based on voluntary and informed consent from the individual user. Consent can be revoked at any time.

The collected personal data from EarlyBird are processed and stored in Avinor's cloud services (Microsoft Azure and Salesforce), see Item 9.

4. THE PURPOSE OF THE PROCESSING

It is voluntary to use Avinor's networks, website and applications, as well as to provide personal data in connection with these services that allow you to receive information, news, relevant offers, etc. We will use the information about you for the following purposes:

- (i) for statistics, aggregation and management of the websites and services. Information is collected in order for Avinor to obtain additional information about the users, e.g. in order to track general usage patterns. We use this information to manage and improve our services, as well as to adapt capacity and logistics at the airport and thus simplify and improve the passenger experience and contribute to a seamless journey.

The information we collect through EarlyBird can be used for the following purposes:

- (i) to simplify your journey by giving you relevant and tailored information, for example about your check-in counter, gate, delays, etc., if you have chosen to become an EarlyBird user.
- (ii) to provides you with relevant and bespoke services or products from Avinor or Avinor's partners, such as parking, shops, restaurants etc.

5. WHAT INFORMATION IS PROCESSED?

We process both personally identifiable information and non-personally identifiable information about you. Personally identifiable information is information that identifies you as an individual. Non-personally identifiable information is information that does not reveal your personal identity.

Personally identifiable information

Avinor collects and processes the following information about you, depending on which services you use:

(i) When you use Avinor's WiFi at our airports:

- E-mail address or telephone number
- MAC address, IMEI number and IP address. We do not connect this information directly to you as a user before you register for EarlyBird. We use the information to manage and maintain our websites. Examples of what statistics can tell us, include: how many people visit various websites, how long these visits last, what websites the users come from and what browsers are used. This makes it possible for us to prepare even better and more user friendly services.
- Location data, such as GPS, WiFi and beacons.

(ii) If you send an inquiry to Avinor, for example by sending us an e-mail, relevant information may be stored, for example your name and e-mail address.

(iii) If you log in to EarlyBird through our website or Avinor's applications:

- Name, postal code, telephone number, date of birth, gender, e-mail address, preferences, history, travel information such as flight number, destination, departure time, type of travel, booking number and travel companion(s).
- Location data through GPS, WiFi, beacons and mobile network
- MAC address and IMEI number. We use this information to manage and maintain our websites, as well as simplify your log-in. Examples of what what statistics can tell us include: how many people visit various websites, how long these visits last, what websites the users come from and what browsers are used. This makes it possible for us to prepare even better and more user friendly services.
- If you book parking through Avinor's website or applications, relevant information such as your e-mail address, name, address, mobile telephone number and information about your car such as registration number, make, model and colour will be stored.

Avinor does not collect more information than we use at any given time to simplify and improve your travel experience, in line with what you have given consent for.

Avinor does not process information about children under the age of 15 without the consent of parents or guardians.

More details about location data

EarlyBird uses location data in order to adapt the user experience, information and the offers you receive, to where you are located, the relevant journey, etc. Beacons are transmitters located in various places at the airport. They transmit data via Bluetooth that Avinor's installed applications on your mobile phone will recognise. Beacons will therefore not be activated unless you have turned on Bluetooth and Avinor's applications are enabled. Read more about beacons here <https://developers.google.com/beacons/>.

The application will alert you before we start collecting and processing your location data, and the alert will let you choose whether or not you want to give Avinor access to location services. You can choose to deactivate location services on your unit at any time.

6. WEB ANALYSIS AND COOKIES, ETC.

Web analysis

Avinor uses common Internet technologies such as Google Analytics to collect information about our users so that we, at all times, can facilitate the best possible functionality and further develop our information services. Google Analytics stores cookies in your browser and registers the user's IP address. Google Analytics also collects information about your unit's location, as well as flight numbers registered through our websites and applications. Since IP addresses are considered to be personal data, Avinor removes the last part of the IP addresses before the information is stored by Google, so that personal information is not collected or stored. Avinor does not connect the information about IP address and location directly to you as a user. The information is only used for analysis and statistics purposes. The statistics make it possible for us to prepare even better and more user friendly services.

Cookies and LocalStorage

Avinor's website and applications use cookies and HTML5 LocalStorage. Cookies are small text files that the app asks your browser to store on the mobile unit. LocalStorage is newer technology, but has much of the same functionality. This e.g. allows the app to remember your actions or preferences over time, thus making it more user-friendly. Avinor's website and applications use the following:

- Google Analytics:

- ga.js cookies are e.g. used to distinguish users, determine which domains are to be measured, remember the number and duration of previous visits and when the visit started and ended. Expire after 2 years.
- gat.js cookies are used to reduce the request rate. Expire after 10 minutes.
- Local Storage: The flight number and date are stored on your machine or mobile unit so that you, as a user, won't have to type this in again every time you open the website

The tools use first-party cookies only to collect data. The information is not used to identify you as a person.

Presets in mobile units or browsers indicating that the user accepts cookies, are regarded as consent. You can always choose not to accept cookies by changing your computer's settings to reject cookies or to authorise cookies one by one, but this may restrict the number of available functions. These settings are considered to be consent if they are such that the user expresses acceptance for the use of cookies. This also applies if the browser is configured in advance for acceptance. The same applies for LocalStorage.

In order to read more about cookies, etc., including how you can opt out from cookies on your computer, see e.g.: <http://www.allaboutcookies.org/manage-cookies/> and [Google Analytics](#)

7. THE LEGAL BASIS FOR THE PROCESSING

We have a basis for processing personal data pursuant to Section 8 of Act No. 31 of 14 April 2000 relating to personal data. The basis for processing is consent from you and that we can attend to a justified interest, i.e. improving our websites, applications and other services and offers at the airports.

8. DIRECT MARKETING

If you log on to WiFi, visit Avinor's website or download Avinor's applications, you can consent to become an EarlyBird user. By becoming an EarlyBird user, you will receive useful information linked to your journey in addition to tailored offers, services, newsletters, competitions, customer surveys and other marketing from Avinor and our partners.

The offers will concern all types of products, services and benefits that are relevant for travellers at Avinor's airports and which are offered by Avinor or our partners, including shops, restaurants, airlines and other suppliers or partners. If you consent to this, you will be able to receive information about products and services that are relevant for you via e-mail, MMS, text messages and push messages. You can choose yourself which channels you want to receive offers through by opening your personal settings in EarlyBird.

You will receive commercial information through newsletters, e-mail, etc., on average once or twice a month, but somewhat more often during peak seasons such as the autumn holiday, Christmas, Easter and summer holiday. You will also receive push messages through EarlyBird in connection with your journey to and from the airport and while you are at the airport. You will receive the push messages based on where you are, your movement pattern and where you are travelling, as long as you have installed our app and accepted location services.

If you no longer want to receive offers from Avinor or our partners, you can withdraw your consent at any time by opting out of receiving marketing in your personal settings in EarlyBird. If you opt out, you will no longer receive tailored travel information through EarlyBird.

We will not allow third parties to use your personal data for marketing or communication purposes, unless you have given consent to this. Offers and other messages are published by partners and advertisers in a dedicated solution, but are communicated via Avinor's systems. Partners and advertisers do not have access to your identifiable personal data.

9. DATA PROCESSORS

Avinor has entered into agreements with the following data processors:

- Microsoft - supplier of the Azure cloud service, where personal information is stored
- Salesforce – supplier of the cloud service for Avinor's follow-up and collaboration with partners (CRM B2B).
- The Rocket Science Group, LLC d/b/a MailChimp for sending out text messages and e-mails to users of Earlybird

Avinor has entered into written agreements with all our subcontractors. The transmission of personal data to a data processor or subcontractor outside Norway will take place in accordance with the rules of the Personal Data Act and its requirements related to information security.

10. HOW DO WE SECURE THE INFORMATION?

Avinor has established rules and routines for the protection of privacy in line with the rules of the Personal Data Act. We will take all reasonable precautions to ensure that our employees, data processors and third parties act in accordance with these Guidelines and our obligations pursuant to privacy legislation.

Avinor also has a Data Protection Official, see contact information at the start of these Guidelines.

11. YOUR RIGHTS

Anyone who asks is entitled to information about any processing of personal data in an enterprise pursuant to Section 18 (1) of the Personal Data Act. Avinor has provided this information in this declaration.

You are entitled to access your own information. If the information is incorrect, incomplete or the information cannot be processed, you may also ask Avinor to correct or delete the information. See contact information at the start of this declaration.

We do not process or store information about you for any longer than is necessary for the purpose or for what is required according to signed agreements and not beyond the scope of the law. We delete personal data when a user communicates that he/she no longer wants to use the service. We will delete user profiles on EarlyBird that have been inactive for more than three years. IMEI numbers, MAC addresses, IP addresses and UDID numbers will be deleted or anonymised after a period of two weeks.

12. CONSENT, CHOICE OF LAW AND LEGAL VENUE

These Guidelines apply for all users of the website, WiFi and Avinor applications. By using our services, you accept these Guidelines. You agree that any disputes must be heard by a court of law in Oslo in accordance with Norwegian law, unless something else follows from mandatory rule of law.

13. CHANGES TO THE GUIDELINES

Avinor reserves the right to change or update the Guidelines for privacy, cookies and marketing. All changes shall enter into force when they are published, and will cover information collected from this date, as well as existing information. You can find out when these Guidelines were most recently revised by checking the “Most recently updated” section at the top of this page.