

Naviairs Personal Data Policy

In this personal data policy, you can read how we handle the personal data we come into possession of when you contact Naviair or visit our physical locations or our websites (naviair.dk, aim.naviair.dk, briefing.naviair.dk) and/or otherwise use the various services we offer.

Naviair is the *data controller* for the processing of this personal data. Our contact details are as follows:

Naviair
Naviair Allé 1
2770 Kastrup
Telephone 32478000
naviair@naviair.dk
CVR-nr. 26059763

Personal information regarding other persons

If you provide personal data about other persons (e.g. contact information of colleagues in the company you are employed by), you must be sure that they agree to it and that you are allowed to provide such information to us. In addition, you must refer them to this Privacy Policy when you provide us with their information.

Transfer of personal data to 3rd countries

Naviair does not transfer your personal data to 3rd countries (countries outside the EU/EEA) unless you have consented to this, or we are obliged to do so according to international rules or agreements.

Disclosure of personal data – in general

In some cases, we disclose your personal data to other authorities, Naviair's business partners and suppliers, including IT suppliers. These partners only process the personal data either as a data controller or on Naviair's behalf as data processors and in accordance with Naviair's instructions, as we have entered into a separate data processing agreement with these data processors.

We may also disclose your information to external third parties if we are required to do so or if it is part of the service that we as an air navigation service provider provide to you. This could be to the police, tax-authorities, the Danish CAA, the Ministry of Foreign Affairs or other public authorities or foreign air traffic control services/EUROCONTROL/government authorities.

Security

At Naviair, we have high standards of security, also when it comes to the protection of your personal data. Therefore, we have several internal procedures and policies in place to ensure that we live up to our high security standards. If you need to send us sensitive personal data, we recommend that you use encryption, e.g. secure e-mail (digital post) or code-protected file (Word or PDF format).

Your rights

Deletion of personal data – in general

In general, we delete your personal data when we no longer need to process it to fulfil one or more of the purposes set out in the table below. Special rules, including e.g. the Archives Act, may give us the obligation or right to store them for a longer period. The information can also be processed and stored longer if it is anonymized. At Naviair, we have internal guidelines for the deletion of personal data which describe when personal data must be deleted.

Right to restriction of processing

In certain cases, you have the right to have the processing of your personal data restricted. If you have the right to have the processing restricted, Naviair may only process your personal data with your consent, unless the purpose of the processing is to establish, defend or assert a legal claim, or to protect a person or important public interests. However, Naviair may continue to store your personal data.

Access to your personal information

If Naviair processes your personal information, you have the right to access the information we have collected about you, you also have the right to object to our collection and to the further processing of your personal data. You also have the right to have your personal information corrected if necessary.

If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out prior to your withdrawal of your consent.

What personal information do we collect and why

At Naviair, we only collect the necessary information about you. In the table below, we have described how we process your personal data. We encourage you not to submit or inform us of sensitive personal data when you use our website and its functions.

Do you want to change your information or opt out of services?

You may write to Naviair's Data Protection Officer dpo@naviair.dk if you want insight into the information we have collected about you or if you want us to change or delete personal information we have registered about you, or if you otherwise have questions about our personal data policy. We ask that you provide us with sufficient information to allow us to process your request, including your full name and email address, in connection with any inquiries regarding your rights, so that we can identify you and properly respond to your request. Do not send your social security number or sensitive information to this email.

Purpose	Categories of personal data	Basis for processing	Processing	Deletion
Cookies We use cookies on our websites to optimize your visit, partly when you navigate around our website and partly to generate statistics on the use of our website. The information we collect is anonymous and cannot be traced to named users.	A cookie is a file that is placed on your computer's hard drive, smartphone or other IT equipment. It makes it possible to recognize your computer/IP address and gather information about the pages and functions you visit/use. A cookie cannot collect the information on your computer or spread computer viruses and other harmful programs. Some cookies are only stored on your IT equipment for as long as you have your browser open, so-called session cookies. Other cookies are stored on your IT equipment for a longer period, so-called persistent cookies. When you return to a website, the cookie is typically renewed automatically. Often, cookies are stored from parties other than the owner of the website (third-party cookies). These can be cookies with ordinary content, but also analysis tools and embedded comment fields.	GDPR Article 6(1)(a) (consent) By using Naviair's website, you consent to our use of cookies as described below. We only set cookies when you move on from our home page, www.naviair.dk. If you no longer wish to consent to the use of cookies, you must opt out of cookies by changing the settings on your browser. However, you should be aware that in this case, there may be services and functions that you cannot use because they require cookies to remember the choices you make. Naviair is the first party to set four types of session cookies that expire when you close the browser. They aim to: • Recognize your IT equipment. • Remember your language choice. • Record the amount of time you are on the website. • Identify your http requests as you move around the websites. We also set as a first party four types of persistent cookies that are stored between 30 days and two years. They register: • How many times you have visited the website. • How long you stay on the website. • Whether you come to the website via search engine, keywords or links. • Whether you are a new or returning user of the website.	We do not disclose this information to others.	The two session cookies are deleted when you close the browser. The persistent cookies are deleted after two years.
Applications (job)	Applications for positions at Naviair	GDPR Article 6(1)(a) (consent)	Generally, we do not pass this information on to others. In special cas-	Applications received via Naviair's application portal are stored for no longer

			es, we use an external recruitment agency. In such cases, we will inform you of this in the job advertisement. We normally use an external system (data processor) to ensure correct processing of your information. You give your consent before we process your data. You can change or delete your profile at any time in the application system and you decide what information you provide.	than 6 months, unless you have given us consent to storage for a longer period and you have the opportunity to correct information in your profile.
Job agent	Name and email and job preferences	GDPR Article 6(1)(a) (consent)	We do not disclose this information to others. We use an external system (data processor) to ensure correct processing of your information. You give your consent before we process your data. You can change or delete your profile in the system at any time.	When you delete your profile in the system, your data will be deleted immediately after.
Newsletters (AIM) You can subscribe to Naviair's newsletters about AIM	If you sign up for our newsletters, we collect your email address and job description.	GDPR Article 6(1)(a) (consent)	We do not disclose this information to others.	If you are registered as a recipient of our newsletters, you are registered with the information you provided when you signed up for our service. You can unsubscribe from the newsletter at any time. When you unsubscribe from newsletters, it can take up to 3 months ?? before your information is deleted from our system.
Naviair's websites (naviair.dk, aim.naviair.dk and brief-		GDPR Article 6(1)(f) (legitimate interests).	We do not disclose this information to others.	

ing.naviair.dk) When you use our websites, we process personal data about you. This addresses the following purposes: <u>Inquiries in general:</u> The information is used to be able to process your inquiry. <u>Provision of digital services:</u> We collect the information so that we can provide a digital service that you have requested. Optimisation and development: We use the information to optimise and develop the user experience on our websites and the services we offer. See more about this under "Cookies". Statistics: We use the information to compile statistics on the use and improvement of our website.	General personal data, such as: In our contact form: https://www.naviair.dk/kontakt/skriv-til-os there we ask for name, phone, address, postal code, city, e-mail and then it is possible to fill in a text field. Information about your behaviour on our digital services (e.g. number of visits). Information about how you access our digital services, including IP address, use of browsers and operating system, cookies, which domains you come from and what content you read).	Naviair is part of the public administration and is therefore obliged to store/record inquiries if they are of importance to a case. This is done in accordance with the Public Administration Act and the provisions of the Archives Act. Our legitimate interest in providing digital services is to provide a service that you have requested, improve the customer experience, develop and improve our digital services (both functionality and on the system side).		We only store general inquiries and responses to them for a maximum of 30 days, unless they are inquiries regarding specific cases that must be recorded. Information about your behaviour on our website and when using our digital services (e.g. from cookies and IP addresses, etc.) is stored for up to 1 year after registration.
Links to other websites On our website there are links to other websites or to integrated websites.	Naviair is not responsible for the content of other companies' websites or for their practices in connection with the collection of personal information.	When visiting other websites, you should always read the website's privacy policy (personal data policy/privacy policy).	We do not disclose your information to others.	Deletion not relevant.
Communication – non-operational (email, phone) Naviair processes your personal data so that we can communicate with you and so that we can respond to your inquiries.	The information that Naviair processes about you is ordinary personal data, including your contact details.	GDPR Article 6(1)(f) (legitimate interests). Our legitimate interest is to be able to respond to your inquiry and communicate with you.	We do not disclose your information to others unless you have specifically consented to it or your inquiry requires consultation/involvement of other authorities or the like.	We store your ordinary personal data for up to 1 year from your registration, unless your inquiry has given rise to case processing (see "case processing" or there is otherwise a legitimate need to store the contact information.

Case management (general) If your enquiry has given rise to case processing, we process your data to be able to answer your question/inquiry.	The information that Naviair processes about you is ordinary personal data, including your contact details. If the enquiry contains other personal data, these will also be processed.	GDPR Article 6(1)(c) and (e) as well as the Archives Act and the Public Administration Act.		We delete the information when the storage obligation expires and any archiving requirement has been met.
Whistleblower scheme	Naviair has a whistleblower scheme on Naviair's website where employees, customers and suppliers can report knowledge or suspicion of matters that conflict with the law or Naviair's internal rules. Reporters are anonymous, but the report itself may contain information about named persons. Naviair is not responsible for the content of reports, but reports are treated confidentially by a special unit within Naviair.	GDPR Article 6(1)(e) (exercise of public authority assigned to the data controller) and Section 22 of the Whistleblower Act.	Naviair uses a data processor to handle the administration of the whistleblower system. In addition, specific inquiries may result in processing by an external law firm.	When a report is considered to have been processed, it will be deleted from the system.
Guest registrations and CCTV surveillance We process personal data about guests who visit Naviair's headquarters in Kastrup. This includes the following purposes: <u>Registration at reception:</u> Our reception registers your personal data in our guest log when you arrive at Naviair. <u>Access card:</u> We also process your personal data for the purpose of issuing an access card so that we can give you access to our facilities. <u>Access to Wi-Fi:</u> We process your personal data (MAC address, etc.) for the purpose of providing you with access to our free Wi-Fi. You'll be asked to give	Name, company, position, e-mail, telephone number. Guests are required to deposit photo identification during their visit to Naviair's headquarters. This is returned after the end of the visit and we do not take copies of this. We make video recordings as a result of the CCTV.	GDPR Article 6(1)(f) (legitimate interests) Our interest is to register and administer your visit to Naviair, including to ensure that unauthorized persons do not gain access. It is in our interest to keep a log of visitors in case security issues arise later, including the need for evacuation. During your visit, we also have an interest in giving you access to our free Wi-Fi and access card distribution so that you can access our locations. For security and crime prevention reasons, we have an interest in video surveillance of our physical locations. We also have an interest in processing your information so that we can provide a	Information regarding meeting bookings is passed on to our canteen supplier. Recipients of the personal data in the form of the video recordings will not be disclosed to anyone other than the police.	We store your personal data in connection with guest registration for up to 1 month after your visit. We delete the guest log no later than 1 week after your visit Registrations in connection with canteen visits and catering from the canteen are stored for 1 year from the date of registration due to internal accounting rules. We delete video recordings after 30 days from the recording, unless we have a lawful reason to keep the recordings for a longer period of time (for example, to

consent before connecting to Wi-Fi. <u>Registration in the canteen:</u> In connection with meetings, we register your personal data in our canteen if you eat in the canteen or provide catering in connection with a meeting. <u>CCTV:</u> For security and crime prevention reasons, we will use CCTV surveillance when visiting Naviair. There are signs with this in the area. There is CCTV surveillance both outside and in a few places inside.		service from our canteen in connection with your visit to Naviair.		handle a specific case).
Flights in Danish airspace Naviair uses, collects and stores data on communication with and surveillance of aircraft for the purpose of providing air traffic services.	For the purpose of providing air traffic services, the following data are normally used: - Radardata - Voice communication - Flight plans (see below)	GDPR Article 6(1)(c) and (e) The Aviation Act, cf. BL 7-21 and 7-23	The Accident Investigation Board for Civil Aviation and Railways (HCLJ), the Danish Transport Authority (TS), the Police and aviation organisations approved by the Danish Transport Agency must be provided with all available data on request. Information from incident reports and incident reports is covered by the confidentiality of the Aviation Act.	Voice communications are stored for up to 90 days and then deleted. Radardata is stored for 90 days.
Aviation incidents (technical and operational) Naviair receives or collects data on flight safety-related events and events that are assessed to have a potentially negative impact on flight safety.	Radardata, recorded voice communication etc. Naviair only exchanges anonymized data/statements (= without personal data) from incidents with external stakeholders and only presents radar data with call-sign in agreement with the companies in question. Personal information in reports and	GDPR Article 6(1)(c) Aviation Act EU 2017/373, Annex III – Part ATM/ANS, ATM/ANS.OR. A.065 Occurrence reporting. EU 996/2010 - On the investigation and prevention of civil aviation accidents and incidents EU 376/2014 - On reporting, analysis and follow-up of occurrences in civil aviation EU 2015/1018 - Establishing a list classifying occurrences in civil aviation to be	Information may be disclosed to the Accident Investigation Board for Civil Aviation and Railways (HCLJ), the Danish Transport Authority, the Danish Armed Forces, the police and airports as well as the aviation organisations approved by the Danish Transport	If the information is included in the processing of a case about an incident, the guidelines for this are followed.

	surveys is anonymized and only accessed by those responsible for investigating incidents.	reported in accordance with Regulation (EU) No 376/2014 of the European Parliament and of the Council	Authority.	
Flight schedules	Applicants must provide information about the flight in the form available on Naviair's website (briefing.naviair.dk), including the applicant's name and email address.	GDPR Article 6(1)(c) and (e)	The information is passed on to other countries' air traffic control services if the flight is also to take place outside DK FIR. Eurocontrol receives data on actual flights in Denmark for use in tax collection.	Information in flight plans is retained for up to 90 days. If the information is included in the processing of a case about an incident, the guidelines for this are followed.
Briefing (Telephone inquiries regarding NOTAM, flight plans and/or general information for briefing as well as user profiles for NOTAM reports in CRONOS)	Phone calls are recorded. User profiles (name and contact information) are recorded.	GDPR Article 6(1)(c)		Phone conversations are usually deleted after 30 days.
Applications for state flights (diplomatic clearance)	Foreign states wishing to carry out a state flight in Danish, Greenlandic or Faroese airspace must apply for this by using the application form available on Naviair's website, including the name and e-mail address of the contact person, information about VIP, purpose, route etc.	GDPR Article 6(1)(c) and (e) Section 156 of the Aviation Act and BL 10-2 The Bookkeeping Act	The information is passed on to certain public authorities for the purpose of assessing the application. A copy of the authorisation must be passed on to the relevant authorities in Denmark and, if applicable, the Faroe Islands and Greenland (if the flight takes place in these airspaces)	We delete the information when the storage obligation expires, and any archiving requirement has been met. Information about VIPs is used to ensure correct tax collection (en route charges as well as TNC).
Information from the aircraft register Naviair obtains information from the Danish Transport Authority (CAA) about owners/contact persons on aircraft registered in the Danish aircraft register for the purpose of possible tax collection	Name, contact details.	GDPR Article 6(1)(e) and the Bookkeeping Act (in connection with tax collections)	Information may be disclosed to emergency services in the event of search and rescue operations	The information is stored for a maximum of 5 years (in the case of tax collections)

and in the case of "search & rescue" operations.				
Bookkeeping information	Information that is necessary to document our bookkeeping, e.g. invoices, receivables, correspondence, payment information, contact information	GDPR Article 6(1)(b) and (c)	In certain cases, the information is disclosed to Naviair's bank and may otherwise be processed by Naviair's external auditor.	We delete the information when the storage obligation in the Bookkeeping Act expires.
Tenders – in general	When conducting tenders, Naviair receives information about e.g. contact persons, C.V. from key employees, etc.	GDPR Article 6(1)(c) and the Public Procurement Act and Executive Order no. 1624 of 15 December 2015	In the event of complaints, the information may be disclosed to Naviair's external lawyer and to the Danish Complaints Board for Public Procurement	We delete the information when the storage obligation expires, and any archiving requirement has been met.
Tenders – Service certificates	When conducting EU tenders, Naviair must obtain information on, among other things, criminal offences for participants, but also for the members of the company's board of directors, management and supervisory board, as well as persons who are authorised to represent, control or make decisions in the company's board of directors, management and supervisory board.	GDPR Article 6(1)(c) and Public Procurement Act § 135, § 148, §§ 151-152		We delete the information when the storage obligation expires, and any archiving requirement has been met.
Suppliers etc. (criminal records) To the extent that Naviair's suppliers/craftsmen/consultants need independent access to Naviair's locations, ID cards are provided that give access to selected locations at Naviair. It is a prerequisite for the handing out of an ID card that the person presents a personal ID card and criminal record.	Name, criminal record	GDPR Article 6, stk. 1, Letter B		Naviair stores information about the name, but not the criminal record, as we only confirm that it has been shown to Naviair.

Complaints

If you do not believe that our processing of your personal data is in accordance with applicable legislation, you can always complain to the Danish Data Protection Agency. However, we encourage you to contact us in the first instance so that we can have the opportunity to investigate the matter first. You can contact the Danish Data Protection Agency via "datatilsynet.dk/kontakt" or at the postal address Data Protection Agency, Carl Jacobsens Vej 25, 2500 Valby.

Changes to the Privacy Policy

We reserve the right to change this privacy policy due to significant changes in legislation, new technical solutions, new or improved features, or to improve the website.

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