

# Privacy Policy

Last updated: April 2026

## Our Commitment to Your Privacy

Harrods Aviation respects your privacy and is committed to protecting personal information. This Privacy Policy explains how we collect, use, store, share, and protect personal data, and how individuals can exercise their data protection rights.

This Privacy Policy has been developed in alignment with **Harrods Group security and data protection standards** and with the **Harrods Aviation Information Security Management System (ISMS)**, as defined in the Information Security Management Manual. Personal data is protected through risk-based technical and organisational controls designed to preserve confidentiality, integrity, and availability.

This Policy applies to the processing of personal data relating to **customers, passengers, visitors, contractors, suppliers, and individuals applying for roles with Harrods Aviation**.

This Policy **does not apply to the processing of personal data relating to individuals once they become employees of Harrods Aviation**, which is covered by a separate Employee Privacy Policy.

References in this Privacy Policy to “we”, “us” and “Harrods Aviation” are to:

- **Harrods Aviation Limited** (Company No. 02043317), registered office:  
87–135 Brompton Road, Knightsbridge, London SW1X 7XL  
ICO registration number: **Z7844628**

This Policy also applies to:

- **Air Harrods Limited** (Company No. 03165147), registered office:  
87–135 Brompton Road, Knightsbridge, London SW1X 7XL  
ICO registration number: **Z7612287**

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## What Personal Information We Collect

Depending on how you interact with us, we may collect and process the following categories of personal data:

- Contact details (name, email address, telephone number)
- Identification information (including passport or identity documents where required)
- Passenger, crew, and visitor details (including manifests and arrival/departure information)
- Recruitment information (CVs, application forms, qualifications, and correspondence)

- Payment and transaction information
- CCTV imagery
- Information contained in correspondence, enquiries, or complaints
- Information provided via cookies and similar technologies

Sensitive personal data is protected in accordance with our internal **data handling and classification standards**, which form part of our ISMS.

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## Lawful Bases for Processing

We process personal data in accordance with UK GDPR and other applicable data protection laws. Processing is carried out under one or more of the following lawful bases:

- **Contractual necessity** – where processing is required to perform or prepare a contract
  - **Legal obligation** – where processing is required to meet legal or regulatory requirements
  - **Legitimate interests** – where processing is necessary for our legitimate business interests, balanced against individual rights
  - **Consent** – where consent has been provided and may be withdrawn at any time
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## How We Use Personal Information

We use personal data for purposes including:

- Providing aviation, FBO, charter, and related services
  - Managing passenger, visitor, and client relationships
  - Operating recruitment and selection processes
  - Meeting aviation, immigration, border-control, security, and regulatory obligations
  - Ensuring safety and security at our locations
  - Preventing fraud and ensuring operational integrity
  - Processing payments and transactions
  - Responding to enquiries, complaints, and data protection requests
  - Establishing, exercising, or defending legal claims
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## Aviation, Immigration, and Regulatory Processing

Where required by law or regulation, we process and disclose personal data relating to passengers and crew for aviation, immigration, and security purposes. This includes:

- Processing identification and passport information

- Submitting **General Aviation Reports (GAR)** to **UK Border Force**
- Sharing relevant data with airport authorities, handling agents, landing sites, and other competent authorities involved in flight operations or border control

Such processing is carried out to comply with legal obligations and aviation security requirements.

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## Sharing Personal Information

We may share personal data:

- Within the **Harrods Group of companies**
- With trusted third-party service providers who support our operations
- With regulators, authorities, or law enforcement agencies where required by law
- In connection with a business transaction such as a sale, merger, or reorganisation

We do **not sell personal data** and do **not share personal data for third-party marketing purposes** without consent.

All third parties acting on our behalf are required to implement appropriate data protection and information security measures and are subject to risk-based due diligence in line with our ISMS.

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## Payments and Financial Transactions

Where customers pay for services, we process payment and transaction information to complete and administer those transactions.

In limited circumstances, payment card details may be recorded temporarily to facilitate the completion or reconciliation of a transaction. Such information is stored securely, retained only for a short period, and then securely destroyed in accordance with our security procedures.

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## International Transfers

Where it is necessary to transfer personal data outside the United Kingdom, we ensure appropriate safeguards are in place in accordance with UK GDPR. These may include reliance on adequacy decisions or approved international data transfer agreements.

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## How We Keep Information Secure

We apply appropriate **technical and organisational measures** to protect personal data against unauthorised access, loss, destruction, or misuse. These measures include encryption and, where appropriate, pseudonymisation techniques.

Personal data protection is managed through a **risk-based approach** integrated into our Information Security Management System. Where required, privacy and security risks associated with processing activities are assessed, and safeguards are implemented accordingly.

All third parties that process personal data on our behalf undergo information security due diligence to ensure appropriate safeguards are in place.

While we apply stringent security controls, the transmission of information over the internet is not completely secure, and we discourage the sending of sensitive information via unsecured channels.

### Personal Data Breaches

In the event of a personal data breach that is likely to result in a risk to individuals' rights and freedoms, we will notify affected individuals and the Information Commissioner's Office in accordance with applicable law.

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## Retention of Personal Information

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, and legitimate business purposes.

Where personal data is no longer required in identifiable form, it is securely deleted or anonymised. Further information about retention periods is available upon request.

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## Cookies and Online Technologies

Our websites use cookies and similar technologies to improve functionality and user experience. You can manage cookie preferences through your browser settings. Further information is available in our Cookie Notice.

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## CCTV

CCTV operates at our premises for safety, security, and the prevention and detection of crime. CCTV footage may be disclosed to law enforcement or regulatory authorities where required by law.

Footage is retained for a limited period unless required for investigation or legal purposes.

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## Your Data Protection Rights

Individuals have the right to:

- Request access to their personal data
- Request correction of inaccurate or incomplete data
- Request deletion of personal data where applicable
- Request restriction of processing
- Object to processing
- Request data portability
- Withdraw consent where processing is based on consent
- Not be subject to decisions based solely on automated processing with significant effects

Requests can be made by contacting:

**[data.protection@harrodsaviation.com](mailto:data.protection@harrodsaviation.com)**

Please include “**Data Request**” in the subject line.

If you are in the EU, you may also contact our representative:

**[EURepresentative.Harrods@twobirds.com](mailto:EURepresentative.Harrods@twobirds.com)**

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## Complaints

If you have concerns about how personal data is handled, please contact us in the first instance. You also have the right to lodge a complaint with the Information Commissioner’s Office: **[www.ico.org.uk](http://www.ico.org.uk)**.

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## Updates to This Policy

We keep this Privacy Policy under regular review. Any updates will be published on our website, with the date of the latest revision shown above.