

TRAVEL AFTER GDPR AND PNR

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GDPR - KEY PROVISIONS

Adopted 27 April 2016 - Entry into force: 25 May 2018

OVERVIEW OF KEY PROVISIONS GDPR

- Personal data
- Scope of application
- Fines for non-compliance
- Transparency: right to information of data subjects
- Right to be forgotten
- Direct claim from data subjects
- Joint & several liability
- Duty to appoint a Data Protection Officer (“DPO”)
- Duty of notification in case of (possible) breach/leak

IMPACT ON ACTORS TRAVEL INDUSTRY

- Selling a ticket or package requires booking information from customers
- Subscription to newsletters
- Exposure to great fines in case of wrong use of data:
Highest of EUR 20 million or 4% of annual global turnover

To do:

- Flow through GDPR requirements
- Ensure regulated access to data through Data Protection Officer/Department
- Watch out with use PNR data

PNR DIRECTIVE

Adopted 27 April 2016 - Transposition deadline: 25 May 2018

- Aviation security
- Passenger Name Record (PNR) → targeted passenger profiling for
 - Does not apply to intra-EU flights (yet)
 - Passenger Information Unit (PIU)
 - Data protection officer
 - Pull and push mechanism: push preferred
 - Marketing purposes / privacy risks in much broader context
 - How 'forgotten' can one actually become?

QUESTIONS?