

LGPD in Airlines

What will the impact be?

Airlines have a significant flow of personal data, such as relationships with business partners, client databases and loyalty programs. Moreover, data protection compliance programs will have to consider, in addition to sectoral regulation, aspects of foreign legislation, mainly the GDPR (European Data Protection Regulations).

Typical case

After almost a year of investigations, the Information Commissioner's Office (the British Data Protection Authority) recently announced its intention to impose a fine of approximately £183 million (equivalent to R\$897 million) on a famous airline company, since it held that there had been a violation of the GDPR in a case in which company's clients were redirected to a fraudulent website that collected data unduly.

What are the main issues to be aware of?

- 1 Possible application of foreign regulations (e.g., GDPR)
- 2 Storage of personal data (employees and clients)
- 3 International transfer of data
- 4 Companies' applications
- 5 Information security controls
- 6 Loyalty programs
- 7 Use of children's and adolescents' sensitive data
- 8 Respect for sectoral rules (e.g., ANAC Resolution 255/2012)

Tips for complying with the LGPD



Data protection clauses between airlines and business partners



Privacy policies and application, loyalty program and website regulations



Review information security measures and controls



Review data collection on apps, websites, wifi and onboard entertainment systems



Means for data subjects to exercise their rights



Application of the rules on international transfer of personal data



Awareness programs for employees



Establish prevention and incident response plans