Privacy and Data Protection – Airbus-shop

**Website link:** <http://www.airbus-shop.com>

**Key Notes**

* It is following the old law which is essentially from “N 2004-2005 of June 21st, 2004”

Web site is supervised by the law N 2004-2005 of June 21st, 2004 for the confidence in the digital economy, the article L.335-2 of the Code of the Intellectual property and the law "Informatique et libertés" of January 6th, 1978 modified in 2004.

* Web navigation data are collected as usual, user informed about it: IP Address, cookies, date, length of the visit, data is logged in the web servers for the purpose of tracking the illegal activities, and then they are analyzed by authorized persons, they are stored temporarily, no mapping between the user profile and before mentioned data is given.

**Personal data**

* Common personal information are collected for the purpose of providing the service
* They say ADDITIONAL PURPOSES only allowed by user’s consent. Though there is no option to modify this, See figure 1.

These purposes are as follows:

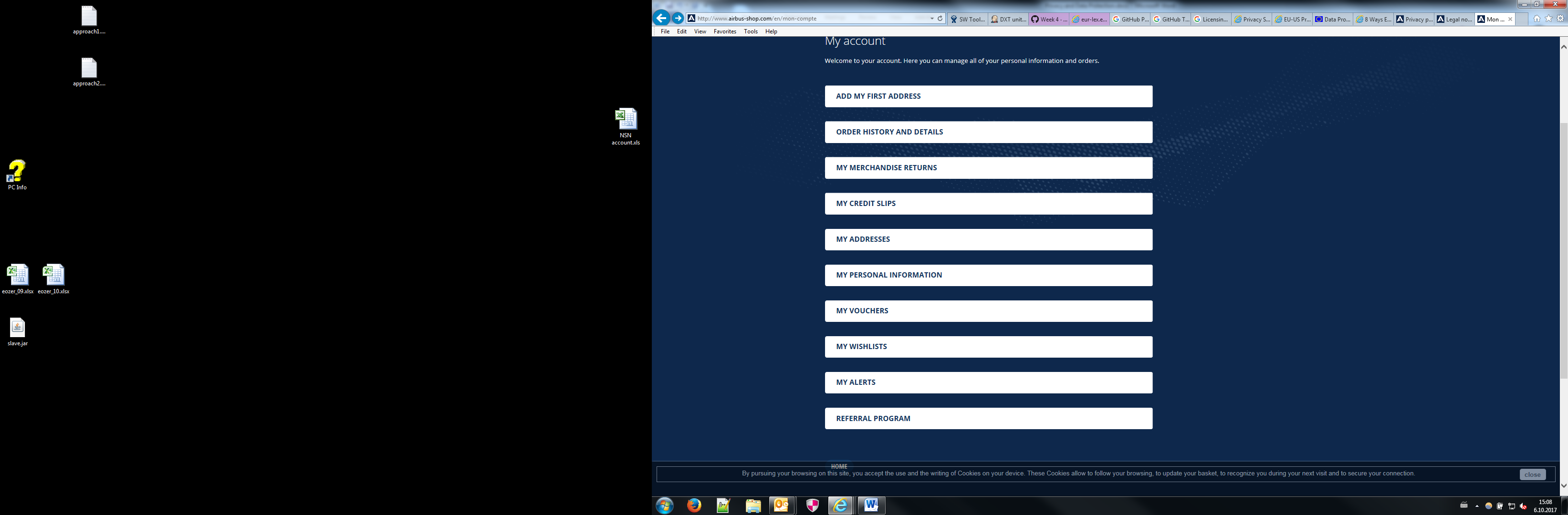
• organizing and holding events including those of a promotional nature,

• statistical surveys, market research and scientific studies,

• sending you news of an informative and promotional nature including advertisements, including without limitation the "airbus-shop" email newsletter, advertising material and/or offers for products or services by mail, via the internet, by phone, email, MMS or SMS text messaging from France or other countries (also from non-EU countries) by AFSO EA and their parent companies and/or subsidiaries or natural persons or legal entities conducting marketing and business activities for AIRBUS/AFSO EA,

• for our own marketing purposes and those of others; to this end, we also share data with third parties to the extent this is permitted by law.

Note regarding your right to object: It is understood that you always have the right to object to the processing (including transmission) and use of your data for marketing purposes or for marketing and opinion research. To do so, please contact the entity in charge of this matter which is listed in paragraph 7.



**Figure 1**: From the categories shown in the account settings, there is not an option to modify the terms that are mentioned in the privacy policy. That is, no interface provides this facility.

* Your personal data may be also disclosed to qualified service providers or suppliers of AFSO EA for the purposes mentioned above (see paragraph 1). This is basically saying we can give your information for other purposes to others, but does user give the consent?
* For any objections regarding data collection and giving consent, users have to object by themselves:

The entity in charge of data processing is

AFSO EA / 25 rue d’ariane, 31240 l’Union, France.

For questions regarding your personal data or any objections regarding data processing/use, please send an email to customercare@airbus-shop.com or send us a written message by mail.

**GDPR Compliance**

* **Article 3 Territorial scope:** Subject firm does not see the Finland as their “free-shipment” under European Union. Resulting additional shipment prices for the users from Finland. It does not necessarily concerning any user data protection, but the service right of the user.
* **Article 6:** Data subject do not have any opportunity to modify his consent for 3rd party enterprises to use his information. Processing for 3rd parties are not mentioned.
* **Article 7-a:** Data subject is oblivious of consent, it is assumed while the registration process.
* **Article 12:** Transparency and objection for the data subject’s information process not presented in a graceful way, rather data subject has to manually make objections, hard to do it.
* **Article 16, 17:** Rectification is only possible by modification, not deletion.
* **Article 18:** Manual effort needed to object the further purposes stated by the enterprise and its 3rd party firms.
* **Article 26:** The previous matters also affecting the Joint controllers-The subject firm and its 3rd parties.

**Verdict**

The subject enterprise requires regulation to its business media as it is already presented in previous aforementioned articles. The subject follows currently the digital economy business law from “N 2004-2005 of June 21st, 2004”, and it has to update by **25 May 2018.** This is the date by which the enforcement will take an action.

**Your Right to Access your Personal Data**

* Chapter 3
  + Transparency and modalities
  + Information and access to personal data
  + Rectification and erasure
  + Right to object and automated individual decision-making
  + Restrictions

The enterprise clearly state that any objection can be made to the following address by the data subject.

The entity in charge of data processing is

AFSO EA / 25 rue d’ariane, 31240 l’Union, France.

For questions regarding your personal data or any objections regarding data processing/use, please send an email to customercare@airbus-shop.com or send us a written message by mail.

**Anonymisation & Pseudonymisation**

Wikipedia definitions:

* **Data anonymization** is a type of information sanitization whose intent is privacy protection. It is the process of either encrypting or removing personally identifiable information from data sets, so that the people whom the data describe remain anonymous.
* **Pseudonymization** is a procedure by which the most identifying fields within a data record are replaced by one or more artificial identifiers, or pseudonyms. There can be a single pseudonym for a collection of replaced fields or a pseudonym per replaced field. The purpose is to render the data record less identifying and therefore lower customer or patient objections to its use. Data in this form is suitable for extensive analytics and processing.

Another definition:

* “**Anonymization**” of data refers to a subcategory of de-identification whereby data can never be re-identified. This differs from de-identified data, which is data that may be linked to individuals using a code, algorithm, or pseudonym.
* “**Pseudonymization**” of data refers to a procedure by which personal identifiers in a set of information are replaced with artificial identifiers, or pseudonyms.

Although terms seem to have pretty close relations in terms of “identifiable person” it seems to me that the main difference swings around the term “replacing with artificial identifier” for the pseudonymization.

Juho’s slide demonstrates some of the existing techniques to solve the anonymization problem.

<bit.ly/anon2017>

From there the examples are:

* Generalization - Transform data to a more generic form
* Perturbation - Modify data slightly, e.g. by adding noise
* k-anonymity - Require that k individuals are indistinguishable
* …

However, the main problem is that as we apply the anonymization methods to the data, we are losing information as we remove and modify. In order to completely make use of the given data the consent of the subjects shall be taken. There are many examples in the computer vision literatures, where the people take place in the experiment and give away their face images (which is indeed one of the most important feature for “identifiable feature”)