

Data Ethics Policy



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1. Validity

The Data Ethics Policy is derived from the Zurich Airport Group Code of Conduct. It is directly valid for the Zurich site. All other group companies base their respective codes of conduct and topic-specific policies on it.

2. Data ethics at Zurich Airport Ltd (FZAG)

“We protect our trade secrets from unauthorised access and treat data relating to our business partners, consumers and other stakeholders with respect and due care. We do so in accordance with confidentiality obligations and data protection laws.”

We protect our own **intellectual property** and **copyrights**, as well as those of our partners. We do not use inside information about FZAG and our partners under any circumstances and do not disclose it prior to public reporting.

We are aware of our role as a central platform for data exchange at our airport sites. In this context, we work with our partners on an equal footing. We collect and use data to improve our processes, in order to make the overall system better.

If it is conducive to the airport system as a whole and legally permissible, we will also grant access to the data we request to our partner companies and to the people who use our airport.

3. The purpose of this document

With its data vision, the Zurich Airport Group has set itself the goal of maintaining an open data culture that recognises data as strategic values. Within the framework of current laws and regulations, we want to create added value with data. At the same time, we want to avoid damage to society or our company through data loss. We recognise the potential for optimisation that the responsible use of data and technology offers to drive innovation, better understand customer needs, control our operations and develop sustainable solutions.

Our Data Ethics Policy sets out the principles and values in the handling of operational and personal data, so that we can achieve this vision. By data we mean:

Operational data: all data which refers to the operational activities of Zurich Airport Ltd and its airport partners, e.g. but not limited to, data from air operations, real estate operations, commerce and retail and international business, with the exception of personal data. Operational data may constitute trade secrets that are subject to specific confidentiality requirements.

Personal data: all data relating to a specific or identifiable person. In order to protect such data, FZAG complies, in particular, with the Swiss Federal Data Protection Act (FADP) and the European General Data Protection Regulation (GDPR), but also other regulations, e.g. from the Swiss Code of Obligations, from labour law or from specific requirements for authorities.

Data ethics fits into the following document structure:



¹ Personendaten

² Verfügbarkeit, Vertraulichkeit, Integrität, Qualität und Compliance von Betriebsdaten

4. Principles of data handling

The following principles apply to us when handling data of any kind:

Fairness: we always process data in accordance with applicable law and in good faith in such a way that the benefits and burdens for us and the partners and persons concerned are distributed fairly. Through our data processing, we create added value for us, our partners and data subjects. Our data processing is not intended to discriminate against partners or individuals. We try to compensate for temporary inequalities in distribution in the long term.

Creating added value: by using data, we create added value for the people and companies who use our airport. This is expressed by process improvements and thus the optimisation of travel, shopping and visiting experiences at Zurich Airport. We make data available for sharing whenever we are advised to do so and it is possible. In doing so, we respect the requirements of the data protection laws.

Loss prevention: we do not harm individuals and communities with the use of data by protecting them according to a risk-based approach, e.g. from loss or unauthorised access. We will only pass on data to third parties if we can reasonably ensure that they cannot cause any damage as a result.

Transparency: we process data in such a way that the purpose of the processing is understandable to the affected partners and persons. We document what happens to the data. If personal data provided to us has fulfilled its purpose, we will delete it. When we develop data-based models ourselves, we involve the relevant internal and external stakeholders where appropriate, so that they can contribute their concerns and form an impression of the model. If we influence human behaviour with our data processing, then only in the sense of efficient processes in airport operations or the improvement of the travel experience at Zurich Airport. We ensure the use of technology which guarantees the traceability of our data and any changes, insofar as this is possible with reasonable effort.

Purpose limitation: we process data only for the purpose for which we received it. We do not collect any personal data for which there is no clearly defined purpose. We consider possible cumulative and network effects, technical possibilities and constellations of actors in the collection, processing and passing on of data and try to avoid negative effects in this way.

Accuracy: we only want to process correct data. To the extent legally permissible, we respect the wishes of our partners and data subjects for the deletion and correction of data and / or the cessation of processing specific data.

Control: we personally question decisions made based on artificial intelligence with significant effects on individuals. We only use algorithms from partners whose reliability we have sufficiently checked and whose basis meets our ethical standards.

Sustainability: we process our data in a way that is as energy efficient as possible. We encourage automation in our processes, while taking into account its impact on human work and its effects in a social context.

Responsibility: we regulate the internal responsibilities of the people involved in data management and consistently adhere to these in our processes. End products are under the clear responsibility of a single person (data owner). The organisational responsibility lies with the executive board.

Data security: data security must be adequately guaranteed for the risk arising from data processing for us, our partners and data subjects. The following applies: the more personal, confidential, secret, important or sensitive the data is, the more stringent the technical data security measures must be.

Imprint

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