

## Case Study



## Data Compliance – Supported an airline to implement multiple data protection laws.

### Industry

Within the airline industry they have passengers from multiple countries, they fly both domestic and international routes, and also have country offices in multiple countries.

For an airline to take passengers from one country to another then lot of personal information needs to be collected and shared. Some examples where they need to share the personal information is with immigration, partner airlines, ground handling companies, airport lounges etc.

For this reason most airlines need to comply with multiple data protection laws across the world. Working with Datahub airlines have found their compliance obligations “smoothly and seamlessly”.

Some data protection laws have extra-territorial reach. Meaning that the law applies to organisation inside the territory but also with organisations outside of the territory.

### Challenge

The airline is a Middle East based airline and had country offices in Europe, UK, and a number of middle east countries. For this reason, there was multiple data protection laws that needed to be considered and staff in different regions to be trained.

As well as EU GDPR and the UK DPA 2018, we also needed to consider Swiss data protection law, UAE data protection law, DP law for the kingdom of Saudi Arabia, and also DP law of Kuwait.

### Solution

We had worked with the airline for many years and helped them with compliance with the EU GDPR and UK DPA 2018. For this reason, we were not starting from nothing. There were processes in place that would just need adapting or adding too.

Initially we needed to do a comparison of the laws and provide informative information to the airline on the key differences. After that we created an action plan move forward.

- Datahub assigned a dedicated data protection expert to work closely with the airline.
- Create awareness video training so this was available to all staff globally.
- Reviewed and updated all the policies and procedures to align with all the DP laws.
- Have an internal employee to internally lead with the data protection rollout.
- Completed light audits at the offices in UAE, Saudi Arabia, and Kuwait. This did involve some international travel, but some was completed on conference calls.
- Provide training to the management and staff within the UAE, Saudi Arabia, and Kuwait regions. As these are newer laws then training was key to the rollout.
- As an external company and being the data protection subject matter experts (SME) for the airline it was key that there were lines of communication and information / updates could easily be shared. We created a central portal to do this that all regions could access.
- All the processes were mapped out in flow charts and a "Record of Processing Activity" for each region was completed.

As some of these are new laws and amendments to the law may be published then Datahub will work with the airline to implement and remain compliant.

## Outcome

Datahub worked with the airline at their headquarters and also worked with their country offices in Europe and Middle East regions to ensure that they were compliant and Datahub conducted awareness training with the staff.

There are now multiple new data protection laws and understanding the compliance obligations for an organisation can be overwhelming. Datahub can support with this and advise on the laws that an organisation would need to comply with and then differences between the laws.

## Data Protection Laws Referenced

EU GDPR  
General Data Protection Regulation (Regulation (EU) 2016/679

UK Data Protection Act 2018  
[Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)

Swiss  
Federal Act on Data Protection (FADP)  
Will become effective as of 1<sup>st</sup> September 2023

UAE DP Law  
Federal Decree-Law No. 45 of 2021  
[Data protection laws | The Official Portal of the UAE Government](#)

Kingdom of Saudi Arabia  
Royal Decree M/19

DP Law of Kuwait  
Decision No. 42 of 2021 on Data Privacy Protection Regulation  
[Resolution-No-42-On-Data-Privacy-Protection-Regulation.pdf \(citra.gov.kw\)](#)

