



**Code of Conduct  
established by  
the Aerodromes of Switzerland  
on  
Cyber Security**

**Preamble**

Having regard to the needs and requirements of their Customers,

Having regard that the communication by electronic means enables gains in efficiency on the one hand, but at the same time requires the awareness of all parties, in order to ensure communications security,

Having regard that aviation-specific systems may contain sensitive information and/or perform critical processes,

Having regard that aviation-specific systems are often used continuously and are relevant to a large number of companies and individuals alike,

Having regard that in addition to Swiss regulations on data protection, including but not limited to the Federal Act on Data Protection (FADP, SR 235.1), also the European General Data Protection Regulation (EU) 2016/679 (GDPR) may be applicable, depending on the circumstances,

And concluding that the aim is to ensure safe and secure aerodrome operations in order to preserve the confidentiality, integrity and availability of the systems and data involved,

The **Aerodromes of Switzerland** commit themselves to the following **quality objectives** when making use of electronic means of information, communication and data processing:

1. *The Aerodrome has implemented a set of governance measures for cyber security embedded within its safety and security framework, and based on a risk management approach, which takes into account the risks identified at the national as well as those applicable at the organizational or business process levels.*
2. *The Aerodrome maintains a cyber security culture: Its staff are aware of the risks, operate in a coordinated manner on a need-to-know basis, receive specific training and associated clearances and maintain an adequate level of expertise.*
3. *The Customer's Data that is being processed by the Aerodrome, e.g. by using an online tool provided by the Aerodrome or through an exchange of messages with the Aerodrome will be handled with the utmost care.*
4. *In order to ensure the protection of personal data particularly, the Aerodrome will have both technical and organizational measures and processes in place.*
5. *All the data that is processed and/or stored by the Aerodrome will be exclusively stored for its intended use. Personal data will only be stored for as long as permitted by law in order to provide the Aerodrome's services to the Customer or to comply with the Aerodrome's legal obligations and to prevent misuse.*
6. *All the data that is processed by the Aerodrome will be deleted in accordance with the legal provisions as soon as the consent to its processing is revoked or other reasons no longer apply (i.e. particularly as soon as the specific purpose for processing the data no longer applies).*
7. *With the sole exceptions of legal or judicial obligations, as well as for IT-related maintenance and upgrade works, personal data of the Customer and of associated individuals will not be passed on to third parties. The Aerodrome may conclude non-disclosure agreements with third parties (e.g. suppliers, supporters, maintainers etc.) in order to enhance the protection of the Customer's data.*
8. *The Aerodrome manages adequate responses to cyber incidents within the framework of its overall emergency response/crisis management/contingency planning.*
9. *The Aerodrome maintains links to the Swiss national authorities for cyber incident reporting, evaluation, response and threat monitoring.*
10. *The Aerodrome requires close cooperation with its Customers and with stakeholders regarding cyber security, in order to better assess and mitigate potential risks, as well as the partner's needs. This information sharing shall be done only with trusted partners and should be based on the sensitivity of the information.*