Booker Gliding Club

# **PRIVACY STATEMENT**

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Booker Gliding Club ("the club") is committed to protecting your privacy. This Statement of Privacy applies to how we govern data collection and usage.

# **Collection of your Personal Information**

The club collects personally identifiable information such as your e-mail address, name, home address and telephone number from all its members, we also record details of the flights that you have. We may review your medical information with you, but this is not held on any of our IT systems. We may also hold your bank account details if you have consented to direct debit payments, these details are only held as hard copy. This information is collected when new members join the club and annually at membership renewal. The club does not collect other sensitive personal information, such as ethnicity, religion, political affiliations.

If you receive our newsletter, then your email details are recorded in a secure on-line MailChimp database, and this data is in turn managed in accordance with Mailchimp's own <u>Privacy Policy</u>. Performance of our website is monitored using GoogleAnalytics. This software can provide reports for the website manager and marketing team. In line with standard industry practice it records the IP addresses and location of visitors to the website.

We use TeamUp software to manage the instructor and cadet rosters, the club only enters data into this system with the agreement of the individuals that are rostered as part of the club's normal operating requirements. Members may choose to use a nickname for this roster in order to protect their privacy.

#### Legal basis

The legal basis for most processing of your personal data is to enable the club to fulfil our contractual obligations and provide membership services; and to fulfil any legal obligations.

The legal basis for data entered onto the TeamUp rosters is *consent*. You will only be entered on rosters at your own request.

# Use of your Personal Information

Booker Gliding Club collects and uses your personal information to communicate with you and ensure we operate for the benefit of our members. Booker Gliding Club does not sell, rent or lease the information of its members to third parties. Some information, such as your flight details, may be collected in order to meet other regulatory requirements and we may provide this data to other authorities if we are legally required to do so. We use some data about our Facebook, website and blog visitors to determine which pages are popular and to ensure these social media platforms are operating correctly. The raw data for these reports is held by the service providers and the club would only investigate these reports in any detail (eg to an individual IP address) when abuse of these systems was taking place.

# Security of your Personal Information

We secure your personal information from unauthorised access, use or disclosure. The club secures the personally identifiable information you provide on computer in a controlled, secure

Booker Gliding Club Ltd Registered in England at the above address – Reg No 1492733 VAT No: 350418283 environment, protected from unauthorised access, use or disclosure. Hard copies are retained in our office which is separated from normal member areas of the club. Data considered sensitive is held within locked filing cabinets.

### How long do we retain your information?

We will hold your personal information on our systems for as long as is necessary to carry out our obligations in relation to your membership, or as long as is set out in any relevant agreement between us. Where an individual persons club membership lapses your information will be securely kept for a period of 5 years, after which your information will be deleted.

# Changes to this Statement

The club will occasionally update this Statement of Privacy to reflect changes in the law or member feedback. The latest version will always be posted on the club's website.

# What are your rights?

the right to access;

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. Contact the club office if you wish to receive a copy of the data we hold.

the right to rectification;

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

the right to erasure;

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data being no longer necessary in relation to the purposes for which the data was collected or otherwise processed, you are no longer a club member and wish the data not to be held for the standard term.

Please note a request for data erasure for a current member would require that member to forfeit membership. The data is required for the club to fulfill its obligations.

the right to restrict processing;

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

the right to object to processing;

You have the right to object to our processing of your personal data for direct electronic communications purposes. If you make such an objection, we will

cease to process your personal data for this purpose.

Please note that such a request may require you to forfeit membership – as the data processing is generally essential to operate the club legally and safely.

the right to data portability;

To the extent that the legal basis for our processing of your personal data is that the processing is necessary for the performance of a contract to which you are party and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

## the right to complain to a supervisory authority;

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioners Office. *https://ico.org.uk* 

the right to withdraw consent.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

#### **Contact Information**

The club welcomes your comments regarding this Statement of Privacy. If you believe that the club has not adhered to this Statement, please contact us by emailing <u>office@bookergliding.co.uk</u> or <u>webmaster@bookergliding.co.uk</u> We will use all commercially reasonable efforts to determine and remedy the problem promptly.