

HEREFORDSHIRE AERO CLUB LTD

PRIVACY POLICY

1. INTRODUCTION

- 1.1 The following statements constitute Herefordshire Aero Club Ltd (HAC) Policy for Privacy.

2. POLICY

- 2.1 This sets out our commitment in terms of your personal data and how we will use it.

PRIVACY POLICY

We are committed to protecting your privacy, and will ensure that any information you provide to us will be collected and used in accordance with the Data Protection Act. We will not share your data with any third party organisations and will only use it for the purpose stated to you at the time of collection.

3. COLLECTING PERSONAL INFORMATION

- 3.1 We may collect, store and use the following kinds of personal information;

- (a) Information that you provide to us when registering as a member. (Name, address, email, DOB, telephone number, emergency contact, licence details, next of kin)
- (b) Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (name and email address)
- (c) Information that you provide to us when signing up as a student (Name, address, email, DOB, medical certificate, passport copy, telephone number, next of kin)
- (d) Information that you provide to us to sign up for the Direct Debit scheme (Name, address, email, bank details)
- (e) Information that you provide to us when you become a temporary member (Name, address, email, telephone number)
- (f) Information that you provide when you become a member of staff (Name, address, telephone number, email address, bank details, next of kin)
- (g) Information that you provide when requesting PPR to land at the airfield (Name, telephone number)

- 3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

4. HOW DO WE GET YOUR CONSENT

- 4.1 When you provide details for all of the items listed above in 3.1, we imply that you consent to us receiving these personal details in order to provide you with the services you have signed up for.
- 4.2 Any provided personal information is processed for your convenience as a legitimate business interest and is for our use only ("Legitimate Interests" means the interests of our company in conducting and managing our business [to enable us to give you the best service/products and the best and most secure experience]).

5. USING PERSONAL INFORMATION

- 5.1 Personal information submitted to us will be used for the purposes specified in this policy or on the relevant pages of the website.
- 5.2 We may use your personal information to:
- (a) Enable your use of the services available at the Aero Club and on our online booking system.
 - (b) Send statements, invoices and payment reminders to you, and collect payments from you.
 - (c) Send you email notifications that you have specifically requested.
 - (d) Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter or use unsubscribe option on the bottom of the email).
 - (e) Send you relevant marketing communications which we think may be of interest to you, by email or similar technology.
 - (f) Ensure your safe arrival at intended airfield.

6. DISCLOSING PERSONAL INFORMATION

- 6.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers and agents, insofar as reasonably necessary for the purposes set out in this policy.
- 6.2 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
 - (b) in connection with any ongoing or prospective legal proceedings;
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- 6.3 Except as provided in this policy, we **do not** nor will we ever sell or rent any information you provide to third parties for any reason.

7. RETAINING PERSONAL INFORMATION

- 7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 Without prejudice to Section 7.2, we will usually delete personal data falling within the categories set out below at the date/time set out below:
- (a) Financial account information will be kept for 7 years.
 - (b) Membership data will be deleted from the database after 2 years of non-renewal or within a week of Membership being terminated.
 - (c) Student records will be kept for 8 years from completion of course.
 - (d) Employee data will be kept for 6 years after they have left.
 - (e) Temporary membership forms will be destroyed within a week of entry onto our database if permission for contact has been given and within two days if permission has not been given.
 - (f) PPR contact details will be destroyed after arrival at intended airfield.
- 7.4 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
 - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
- 7.5 You can request us to delete personal data earlier as explained in section 10.

8. SECURITY OF PERSONAL INFORMATION

- 8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 8.2 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 8.3 Only staff members on duty at the time will have access to your personal data. Any non-staff member or staff member not on duty that day that is seen in entry-controlled areas such as behind the reception should be reported unless accompanied at all times by a staff member on duty.

9. AMENDMENTS

- 9.1 We may update this policy from time to time by publishing a new version on our website.
- 9.2 We may notify you of changes to this policy by email.
- 9.3 You should check this page occasionally to ensure you are happy with any changes to this policy.

10. YOUR RIGHTS

- 10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - (a) the supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport plus an original copy of a utility bill showing your current address.
- 10.2 After receiving a written request either by email to accounts@shobdonairfield.co.uk or by post to Herefordshire Aero Club Ltd, Shobdon Airfield, Shobdon, Herefordshire, HR6 9NR for access to the personal data we hold on you, we will provide the information to you within one month.
- 10.3 We may withhold personal information that you request to the extent permitted by law.
- 10.4 You may instruct us at any time not to process your personal information for marketing purposes.
- 10.5 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

11. UPDATING INFORMATION

- 11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

12. CCTV

- 12.1 The CCTV system and the images produced by it are controlled by Herefordshire Aero Club Ltd who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).
- 12.2 We have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV.
- 12.3 Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.
- 12.4 The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.
- 12.5 Except for law enforcement bodies, images will not be provided to third parties.
- 12.6 The potential impact on individuals' privacy has been identified and taken into account in the use of the system.

13. WEBSITE

13.1 You can visit our website without telling us who you are or revealing any information about yourself, including your e-mail address. Our web server may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from.

13.2 We use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website. In addition, we collect the personal information that you submit to our website, such as your name, address and any other contact or other information that you choose to provide by using the contact section of the website.

13.3 Sharing of the information this website gathers

The Shobdon Airfield website contains links to other websites. Please be aware that our privacy policy does not apply to these linked sites. We encourage you to read the posted privacy statement whenever interacting with any website.

13.4 Cookies

13.5 Our website uses cookies.

13.6 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.7 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.8 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

For, and on behalf of, Herefordshire Aero Club Ltd.:

Name:

Signature:

Date: