



DEVON & SOMERSET GLIDING CLUB

DATA PRIVACY POLICY

September 2018

DSGC DATA PRIVACY POLICY

This privacy policy lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

It includes the following sections:

1. Who are we and how do you contact us and our Data Protection Lead?
2. What kinds of personal information about you do we process?
3. What is the source of your personal information?
4. What do we use your personal information for?
5. What are the legal grounds for our processing of your personal information?
6. When do we share your personal information with others?
7. What should you do if your personal information changes?
8. For how long is your personal information retained by us?
9. What are your rights under data protection laws?
10. Contact us

1. Who are we and how do you contact us and our Data Protection Lead

Devon and Somerset Gliding Club Ltd Data Protection Lead name can be supplied on request from the Club Secretary. (see 10. Contact us)

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with our operation as a gliding club includes:

- Personal and contact details, such as title full name, telephone number, address and Email address
- Date of birth and gender
- Emergency contact details, name and phone number
- Information on type and date of flying medical (where required), and next medical due date
- Date of joining the club, and next subscription date
- Flying record, taken from flight log sheets
- Flying status, such as pre-solo, solo, instructor etc.
- Flying awards, such as bronze, silver, gold, diamond badges
- Photos
- Glider ownership, which privately owned gliders the member owns, has a share in or the rights to fly, and registration details, including Flarm ID.
- Flying licences, such as glider pilots licence, PPL, radio licence
- Volunteer roles, e.g. winch, launch marshal, tug pilot, instructor, club officer
- Employee details
- Admin notes
- Flying account entries and balance
- Bookings for flying, rostered duties, and social events
- Member of any special flying account scheme
- Accident / incident reports

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3. What is the source of your personal information?

We'll collect personal information from the following sources:

- From you directly, e.g. from membership and renewal documents, booking system entries
- Information generated about you when you fly with us, e.g. flying logs, flying account
- Information generated about you on the rota system, e.g. future rostered duties, duty swaps

4. What do we use your personal information for?

We use your personal data, including any of the personal data listed in section 2 above, for the following purposes:

- Ensuring that our flying activities operate efficiently and safely
- Ensuring that we charge you correctly for the flying you do, and other items you purchase
- Communicating to you about club news such as upcoming events, and safety matters
- Communicating to you as one of a specific group within the club, such as DLMs, winch drivers, tug pilots or instructors
- To continue to improve as a club, by tracking progress of against our strategic plan, for example in areas such as age and gender profile, flying activity and glider utilisation

5. What are the legal grounds for our processing of your personal information?

We rely on the following legal bases to use your personal data:

a) Where it is needed to fulfil our contract with you to provide you with our products and services, such as:

- Maintaining our membership database
- Keeping accurate member accounts and financial records
- Maintaining the booking systems for two seater training
- Keeping a record of our member's skills and voluntary activities
- Providing club social activities
- Running interclub competitions
- Informing our members of safety matters, operational matters and upcoming events

b) To comply with our legal obligations, such as:

- Keeping accurate flight logs
- Holding medical information to ensure fitness to fly
- Keeping accurate financial and tax accounts
- Holding training records
- Acting as a responsible employer

c) Where it is in our legitimate interests to do so:

- Continuing to improve the club for the service of its members

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- To administer the good governance of the club

d) With your consent (particularly for ex members and non-members who may have taken a trial flight or a course with us), such as:

- Advertising events, both flying (such as Open Days) and non-flying (such as social events and lectures) to encourage them back to engage with the club, and hopefully fly with us.

6. When do we share your personal information with others?

We share personal information with the following third parties for the following reasons:

- We provide annual statistics to the British Gliding Association (BGA) which includes a breakdown of the number of members by gender and age group. Although we do not send specific personal data (apart from contact details of club officers) we do process members' data to produce these statistics.
- Individuals' flying records and information on whether or not pilots have up to date medicals may be shared with the BGA should the member undertake instructor training or be the subject of an accident investigation, serious airspace infringement or Airprox (in which case the data could also be shared with the CAA and AAIB).
- Club officer details are shared with members.
- Phone numbers and Email addresses are shared with other members to make it easier for members to change rostered duties.
- Email addresses and phone numbers are on the contact pages of the website to make it easier for members to get to know each other and to make contact if needed.
- Information on glider trailers is shared amongst members to enable trailers to be parked in the correct locations and for organising retrieves.

7. What should you do if your personal information changes?

You should tell us so that we can update our records using the Contact Us details of our website, or you can amend your contact details directly online.

8. For how long is your personal information retained by us?

We will delete the following data within 90 days of the end of the Club financial year, of a member leaving the club:

- Emergency contact details
- Admin notes
- Contact details from roster and booking system

Apart from the above, and unless we explain otherwise to you, we'll hold your personal information based upon the following criteria:

- For as long as you are a member of the club, and then for as long as someone could bring a claim against us

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- For as long as we are required to in line with legal and regulatory requirements or guidance
- For the purposes of the two above points we plan to maintain your personal information for a period of 7 years after a member leaves the club, or a trial flight / course occurs, and then delete it within the following 12 months, though we will continue to hold membership number, name, year of birth and flight logs for club statistical purposes.

9. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate, and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you
- The right to complain to the Information Commissioner's Office which enforces data protection laws at <https://ico.org.uk>

10. Contact Us

If you have any questions about this privacy policy or if you wish to exercise your rights or contact our Data Protection Lead, you can contact us by Emailing us at secretary@dsgc.co.uk.