



Trent Valley Gliding Club Ltd
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Trent Valley Gliding Club Privacy Statement

1. INTRODUCTION

Trent Valley Gliding Club Ltd (Company No. 1337319) is committed to protecting your privacy and security. This statement explains how and why we use your personal data, to ensure you remain informed and in control of your information.

This Privacy Statement applies to anyone that Trent Valley Gliding Club Ltd (TVGC) comes into contact with, including but not exclusively; members, volunteers, the general public, professional contacts. We will never sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

For the purposes of this document, the Club's Data Protection Lead is the Club Secretary.

Any questions you have in relation to this statement or how we use your personal data should be addressed to: The Secretary, Trent Valley Gliding Club, The Airfield, Kirton Lindsey, North Lincolnshire, DN21 4GG, or by e-mail: info@tvgc.org.uk.

2. ABOUT US

In this policy wherever you see the words 'TVGC', 'we', 'us' or 'our' it refers to Trent Valley Gliding Club Ltd.

3. WHAT INFORMATION WE COLLECT

- a. **Personal data you provide** – We collect data you provide to us in the course of our usual operations. This includes information you give when joining, flying or communicating with us. For example:
 - personal details (name, date of birth, email, address, telephone etc.) when you become a member
 - details of your interests and preferences (such as gliders that you fly or own)
- b. **Sensitive personal data** – we only collect and store sensitive personal data [that has been provided by you], where necessary and required to do so either statutorily or to provide you with membership (such as, but not limited to, information relating to health, date of birth, next of kin details, etc.).
- c. **Accidents or incidents** – If an accident or incident occurs involving a member then we'll keep a record of this (which may include personal data and sensitive personal data). We may also be required to share this with the appropriate statutory bodies.

4. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

- comply with a legal duty
- protect your vital interests
- for our own lawful interests, provided your rights don't override these

In any event, we will only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

- Marketing** – we use personal data to communicate with people, to promote TVGC and to help with events/fundraising. This includes keeping you up to date with our news, updates and other communications from Club Officers and members. For further information on this please see Section 6.
- Administration** – we use personal data for administrative purposes. This includes:
 - flight logging
 - member account maintenance, transactions and reporting
 - maintaining databases of our members
 - fulfilling orders for goods or services (in whatever form the order is submitted)
 - helping us respect your choices and preferences
- Internal data analysis** – we carry out analysis of the data from our members, to better understand the gliders that our members own or fly and flying/financial statistics. This helps inform our decisions and makes TVGC a stronger and more effective organisation.
- Disclosure and Barring Service** - we may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent (your completion of the relevant documentation).

If your personal information changes, you should tell us so that we can update our records, or you can amend your contact details directly online in FreeFlight.

5. DISCLOSING AND SHARING DATA

We will never sell your personal data. We may contact you with information about our products, services, operational bulletins and membership information, but these communications will always come from TVGC and are usually incorporated into our own communications – which will wherever possible be via the e-mail facility in 'FreeFlight'. Individual members should not hold their own database or mailing lists, but use FreeFlight to communicate with other members.

We will only share information when necessary and for the purposes that you have provided the data to us, including but not limited to:

- 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.

6. MARKETING & COMMUNICATIONS

TVGC will ask its members to “opt-in” for marketing/newsletter communications. This means you have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post, phone, email). Existing members (at May 2018) will continue to be sent information on the basis of current/existing consent, whereas those who join after this date will be asked to “opt-in”.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact The Secretary, Trent Valley Gliding Club, The Airfield, Kirton Lindsey, North Lincolnshire, DN21 4GG, or by e-mail: info@tvgc.org.uk.

- a. **What does ‘marketing’ mean?** – marketing does not just mean offering things for sale, but also includes news and information about:
- our events and activities (social & flying)
 - regulatory/statutory notices and updates
 - fellow member requests
 - appeals and fundraising
 - products and offers
 - taking part in projects

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

- b. **Newsletters and magazines** – membership magazines (such as ‘Kirton Wave’) are provided as a benefit to our members, sent to all our members (unless you specifically ask us not to).

7. STORAGE

We are required to make sure that we use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. Information will where-ever possible (save, for example membership forms) be stored electronically and password protected.

We will delete the following data within 90 days of a member leaving the club:

- Emergency contact details
- Any 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
- 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.

We will regularly review what information we hold and delete what is no longer required.

8. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or analysis; and
- where technically feasible, you have the right to see personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

a. **Complaints**

You can complain to TVGC directly by contacting our data protection lead using the details set out above. If you wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so by contacting The Secretary.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

9. COOKIES AND LINKS TO OTHER WEB SITES

a. **Cookies**

TVGC do not log information in cookies, although any third party cookies relating to certain functions/plugins of the website may store cookies to help improve user experience. We may log page visits/stats and other generic data for our own records in an effort to improve our content and improve user experience for which these records are completely anonymous/non-personal.

b. **Links to other sites**

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working).

If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by this TVGC Privacy Statement. We suggest you read the privacy policy of any website before providing any personal information.

c. **Social Media Sites**

We operate a Facebook and Twitter page. Although this policy covers how we will use any data collected from those pages, it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

By using our web and social media sites, you signify your acceptance of this Privacy Statement. If you do not agree to this, please do not use our Sites. Your continued use of the Sites following the posting of changes to this policy will be deemed your acceptance of those changes.

10. CHANGES TO THIS PRIVACY POLICY

We will review/amend this Privacy Statement from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Statement will always be posted on our website.

This is version 1.0 of Trent Valley Gliding Club's Privacy Statement and was last updated on 22nd May 2018.