

## **The Royal Air Squadron: Privacy Notice**

### **1. Data protection**

The Royal Air Squadron (RAS) takes your privacy seriously. RAS adheres to data protection standards as well as transparency of personal data collection and processing. This privacy notice contains general information on what personal data RAS collect, what they do with that information, and what rights you have. If you have any questions or comments, please contact [admin@airsquadron.org](mailto:admin@airsquadron.org)

'Personal data' is any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

As part of our commitment to protect your personal data in a transparent manner, we want to inform you:

- why and how RAS collects, uses and stores your personal data;
- the lawful basis on which your personal data is processed; and
- what your rights and our obligations are in relation to such processing.

### **2. What types of personal data do we collect?**

RAS collects and processes personal data about you including:

- personal details such as your name, date of birth, documents (including a copy of your passport or national identity card), phone numbers, physical and electronic addresses, and family details such as the name of your spouse, partner, or children;
- information relating to RAS events, details of aircraft and private airfield data;
- where applicable, professional information about you;
- details of our interactions with you, for example email communications;
- we do not record phone calls but we may keep contemporaneous notes of our calls;
- when you access our website, data transmitted by your browser may be automatically recorded by our website service provider, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our website if your disclosure is made voluntarily);
- in some cases (where permitted by law), special categories of personal data, which we may collect from public registers; and
- we may also collect information about additional third parties e.g. guests on RAS trips. Before providing RAS with this information, you should provide a copy of this notice to those individuals.

### **3. On which legal basis and for which purposes do we process personal data?**

#### **3.1 Legal basis for processing**

Depending on the purpose of the processing activity (see section 3.2), the processing of your personal data will be one of the following:

- (i) necessary for the legitimate interests of RAS, without unduly affecting your interests or fundamental rights and freedoms;
- (ii) necessary for taking steps to enter into or executing a contract with or on behalf of you for services or products, or for carrying out our obligations under such a contract;
- (iii) required to meet our legal or regulatory responsibilities;

(iv) necessary for the performance of a task carried out in the public interest;

(v) processing personal data in the public domain; and

(vi) processed with your consent, which we obtain from you from time to time, or processed with your explicit consent in the case of special categories of personal data.

Any consent RAS has obtained to process ordinary personal data does not apply for the purposes of the EU General Data Protection Regulation 2016/679 ("EU GDPR"). Instead, for the purposes of the EU GDPR, RAS relies on the lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests and RAS's ability to rely on any such consent for the purposes of the EU GDPR is hereby waived or extinguished.

### **3.2 Purposes of processing**

We process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. We process personal data for the following purposes:

a) managing your membership of RAS, including communicating with you in relation to the services you obtain from RAS;

b) to arrange events and trips carried out by RAS, both within the UK and internationally;

c) to inform fellow members of relevant data about fellow members, most notably contained within the 'Blue Book';

d) meeting our on-going regulatory and compliance obligations;

e) ensuring the safety of our members and other stakeholders;

f) for prudent operational management; and

g) any other purposes we notify to you from time to time.

## **4. Who has access to personal data and with whom are they shared?**

### **4.1 Within RAS**

RAS has no employees; however the Administrator, Honorary Secretary and Commodore and others designated by them have access to personal data to ensure a consistently high service standard, and to provide services to you.

### **4.2 Third Parties**

When providing services to you, we will obtain consent to share personal data with persons acting on your behalf or otherwise involved in the transaction (depending on the type of service you receive from us), including, where relevant the following:

- aviation authorities and regulatory bodies;
- airfield authorities, most notably when planning an event or trip; and
- other individuals, companies or organisations where necessary for fulfilment of the task.

### **4.3 Service providers**

In some instances, we also share personal data with our suppliers, such as IT and hosting providers and communication services. When we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure.

#### **4.4 Public or regulatory authorities**

If required from time to time, we disclose personal data to public authorities, regulators or governmental bodies, when required by law or regulation.

#### **4.5 Others**

We may need to disclose personal data to exercise or protect legal rights, including ours or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

#### **5. International transfers of personal data**

The Recipients referred to in section 4 above may be located outside the UK. In those cases, except where the relevant country has been determined by the Information Commissioner's Office to provide an adequate level of protection, RAS requires such recipients to comply with appropriate measures designed to protect personal data.

#### **6. How long do we store your data?**

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

#### **7. Your rights**

You have a right to ask RAS to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data based on your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data – these rights are not absolute, as sometimes there may be overriding interests that require the processing to continue, but we will consider your request and respond to you with the outcome.

Where we process your personal data based on your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right under applicable data protection laws to request your personal data be transferred to you or to another controller. You have the right to ask RAS for a copy of some or all the personal data we collect and process about you.

#### **8. Exercising your rights, and complaints**

If you are not satisfied with any aspect of the processing of your personal data by RAS, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your personal data, you can do this by contacting [admin@airsquadron.org](mailto:admin@airsquadron.org)

If you are not satisfied with RAS's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

If you wish to make a subject access request, please contact [admin@airsquadron.org](mailto:admin@airsquadron.org)

## **9. Security Note**

We have in place measures to prevent unauthorised or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means and using appropriate passwords when using unsecure mediums of communication.

## **10. Changes to personal data**

We are committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

## **11. Retention period**

In general, RAS will retain personal data for the period of your membership or contract with RAS plus 7 years. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period.

Material, both physical and electronic, may be retained indefinitely for archival and record purposes.

## **12. Status of this privacy notice**

This privacy notice was updated in May 2018. It is a notice explaining what RAS does, rather than a document that binds RAS or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you.