

Version 1.5

Updated: 13th November 2019

Maintaining your privacy and your trust is very important. We strive to be especially clear on how we use your personal information if and when we collect it, and on the ways in which we can work together to protect your privacy.

For the purposes of the UK Data Protection Legislation & the Applied General Data Protection Regulation this Privacy Policy explains the:

- Identity and contact information of the data controller
- Legitimate interests of the data controller or third party (if applicable)
- Purpose of the processing and the lawful basis for the processing
- Categories of personal data to be processed
- Details of whether personal data came from direct or indirect sources
- Recipients or categories of recipients of the personal data
- Details of data transfers to a third country and safeguards
- Length of time personal data is processed and any criteria used to establish the length of time the data is processed
- Data Subject's Rights (Your rights)
- Right to complain to the supervisory authority/regulator
- Details of any part of a statutory or contractual requirement and possible consequences of failing to provide the personal data
- The existence of any automated decision making, including profiling and information about how decisions are made

What products and services are covered by this policy?

This Privacy Policy applies to the information that we may obtain from you through your use of our website(s), at meetings, events or referrals, collectively called the "Services". If you have any questions or need more information about these Services, please contact us at the email address in the section below.

Data Controller

For the purposes of the data protection & privacy legislation the Data Controller is:-

Barnstaple Pilot Gig Club CIO

("I", "we," "us," "our")

Legal Status: Registered Charity No. 1172955

Trading as: Barnstaple Pilot Gig Club CIO

Postal Address: Beech Park, Fremington,
Barnstaple, Devon, EX31 2PR
Email:
secretary@barnstapleflightclub.co.uk

Purpose and legitimate interest.

How do we use the information we collect?

We may use the information we collect for a variety of purposes, including to:

- Make our Services work for you;
- Provide, operate, maintain, improve, personalise, and promote our Services;
- *Process and complete transactions, and send you related information, including purchase confirmations and invoices;*
- Communicate with you, including responding to your comments, questions, and requests; providing service and support;
- Providing you with information about services, transmitting technical notices, updates, security alerts, administrative messages, or advertising or marketing messages;
- Providing other news or information about us;
- Monitor and analyse trends, usage, and activities in connection with our Services;
- Investigate and prevent fraudulent transactions, unauthorised access to our Services and other illegal activities.

Lawful Basis of Processing General Personal Data

We only process general personal data on the basis that:-

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes and/or;
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract and/or;
- Processing is necessary for compliance with a legal obligation to which the controller is subject and/or
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Lawful Basis of Processing Special Category Personal Data

We only process special category personal data on the basis that:-

- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes and/or;
- Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

Categories of personal data and Sources

What information do we collect from you, and how is it used?

Direct:

You can visit our website without telling us who you are and without revealing any personal information about yourself. To provide full service however, we will most often need to collect some personal information. For instance, we collect information about you when you register for an account and when you create or modify your personal data on one of our Services. The types of Information we collect may include email address, country of residence, your name, postal address and phone number.

Purposes of processing	Categories of individuals	Categories of personal data
Membership	Members	Contact details Financial details Health details
Membership	Non-Members	Contact details

Indirect:

From cookies: We may also collect “cookie” information that we may save to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory. We use cookies to improve and customise our Services and your experience; to allow you to access and use our Services without re-entering your username or password; to log visits and to understand

which areas and features of the Services are most popular. We may also associate the information we store in cookies with personal information you submit while using our Services. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Services.

For specific information on cookies, please read our cookie policy.

Logs: We may record certain information and store it in log files when you interact with our Services. This information may include Internet protocol (IP) or other device addresses or ID numbers as well as browser type, Internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, your mobile carrier, and system configuration information.

Analytics: We and our analytics providers also collect and store analytics information when you use our Services to help us improve our Services. We make sure this data is anonymous by not connecting any analytics data to personally identifiable data such as a name, email address, physical address, or phone number.

Data Relating to Children

We do not offer any online services directly to children and therefore only process personal data for those under the age of 16 with the relevant consent from whomever holds parental responsibility for the child.

How might we share information?

We are not in the business of selling your personal information. We consider this information to be a vital part of our relationship with you. There is, however, and requirement to share your personal information with the following third party:-

CPGA (Cornish Pilot Gig Association) - Our Governing Body - Membership Details for Registration

Lorna Jones - Fundraising - Membership Address Areas (Town)

We will only share this information with your consent: We will not share your personal information with any other companies, organisations, or individuals who are not associated with us unless we have your affirmative consent to do so.

Newsletter Service: We use a commercial application to facilitate our newsletter service.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights: We may disclose your information (including your personal information) to a third party if:

- We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request
- To protect the security or integrity of our products and services
- To protect our property, rights, and safety and that of our customers or the public from harm or illegal activities
- To respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person; or
- To investigate and defend ourselves against any third-party claims or allegations.

Data Transfers

The data controller does not transfer personal data outside of the United Kingdom or European Union.

Data Processor Information

The following third-party service providers are used by us and only process data in accordance with the instructions from the data controller:-

Lorna Jones - Fundraising - Membership Address Areas (Town)

All data processors acting on behalf of the data controller have appropriate safeguards in place.

How long will we keep the personal data?

Retaining some data may be subject to a statutory retention period and this must be adhered to, (to keep certain data for a minimum period of time). This may include personal data (name, address, contact details), but on expiry of such statutory requirement, such data will be destroyed securely. Where possible any personally identifiable data will be anonymised or pseudonymised.

Statutory or other requirements

The data controller does not process personal data in respect of any statutory requirement, nor require personal data to be supplied as part of any contractual agreement, however in respect of the controller's services, certain communications may not be possible without such personal data being supplied, for example an email to furnish with updates information etc. or an address to fulfil an order.

Profiling and Automated Decision Making

No profiling or automatic decision making processes are undertaken by the data controller in respect of any personal data processing activities.

Your rights

Your fundamental rights as a Data Subject are:

1. The right to be informed
2. The right of access
3. The right of rectification
4. The right of erasure (often known as the right to be forgotten)
5. The right to prevent processing
6. The right to data portability
7. The right to object
8. Rights in relation to automatic decision making and profiling

Under the right of access (2), you have the right to obtain:-

- confirmation that your data is being processed;
- access to your personal data; and
- other supplementary information

So that you are aware of and can verify the lawfulness of the processing

Your right to access can be exercised by contacting the data controller as above.
Not all fundamental rights are absolute.

Your right to complain to the supervisory authority/regulator

You have the right to complain about organisations processing your personal data. You can exercise this right by contacting the supervisory authority of the data controller as follows:-

Head office

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number