

Rattlesden Gliding Club

Data Protection Policy

Background

This data protection 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 and includes the following sections -

- Who are we?
- What personal information do we process?
- What is the source of your personal information?
- What do we use your personal information for?
- What are the legal grounds for processing of your personal information?
- When do we share your personal information with others?
- What should you do if your personal information changes?
- Data Retention Policy
- What are your rights under data protection laws?
- Contact Us

Who are we?

Rattlesden Gliding Club is a small, friendly gliding club located in the heart of Suffolk near Stowmarket and Bury St. Edmunds and has been operating on the historic WWII Rattlesden Airfield for over 40 years. RGC is a registered Community Amateur Sports Club (CASC) with a passion for sharing the experience of gliding and helping people of all abilities achieve their dreams of learning to fly.

RGC has around 100 club members, all of whom share a love for gliding with a strong community spirit. Whether you are interested in learning to fly locally, cross-country soaring, aerobatics, competitions or socialising with others, there is something for everyone at RGC.

What personal information 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, date of birth and postal / email address
- Emergency contact details' name, phone number and relationship
- Bank account details, where you have given them to us so that we can reimburse you more easily for any expenditure on the club's behalf. These are held on our bank's system.
- Photographs (if you provided them to us)
- Information on type and date of flying medical (where required), and next medical due date

- Date of joining the club, and next subscription due date
- Student Pilot Training Record
- 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
- Glider ownership, which privately owned glider(s) the member owns, has a share in or the rights to fly, and registration details as well as hangarage if applicable
- Flying licences, such as SPL or FRTOL status
- Volunteer roles, e.g. winch driver, launch marshal, tug pilot, instructor, club officer
- Administrative notes
- Whether on the fixed price to solo scheme
- Whether a member has a caravan or trailer on site
- Flying account entries and balance
- Bookings for flying slots, rostered duties, and social events
- Competition entries
- Accident / incident reports
- CCTV footage
- Complaints and concerns from local residents

Additionally, if the member in question is under the age of 18, their parent of guardian will be responsible for agreeing to these data protection arrangements.

Where does your personal information come from?

We'll collect personal information from the following sources:

- From you directly, e.g. from membership and renewal documents, photos you send to us, information provided via our members' account system
- Information generated about you when you fly with us, e.g. flying logs, flying account, student pilot training record
- Information generated about you on the roster system, e.g. future rostered duties, duty swaps

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
- Delivering comprehensive training
- Ensuring that we charge you correctly for the flying you do and other items you purchase (e.g. hangarage)
- 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 launch marshals, 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
- For glider maintenance purposes such as flying activity and glider utilisation
- To ensure continued compliance with local planning regulations

What are the legal grounds for processing your personal information?

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

1. 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 slot booking systems for two-seater training
 - Maintaining flight instruction records
 - Keeping a record of our member's skills and voluntary activities
 - Providing club social activities
 - Informing our members of safety and operational matters, as well as upcoming events
2. To comply with our legal obligations, such as:
 - Keeping accurate aerodrome flight logs
 - Holding medical information to ensure fitness to fly
 - Keeping accurate financial accounts
 - Holding training records
3. Where it is in our legitimate interests to do so, such as:
 - Continuing to improve the club for the service of its members
 - To administer good governance of the club
4. 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

When do we share your personal information?

We only share personal information when absolutely required to. Typically, this is with the following third parties:

- 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
- Training records are shared with instructors to deliver structured and comprehensive training and to review students' progress
- Individuals' flying records and medicals validity 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
- Email addresses are implicitly shared with other members on the club Members' system to make it easier for members to communicate
- Signal Messaging where Member's choose to participate in one or more messaging group(s)

What should you do if your personal information changes?

Please inform us at the earliest convenience so that we can update our records. See the *Contact Us* section for more information.

Data Retention Policy

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

- Bank account details
- Emergency contact details,
- Photo
- Admin notes
- Contact details from roster and booking system
- Contact details on competition database system
- Membership of single seater scheme
- Fixed price to solo scheme
- Whether you have a caravan

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 12 months after a member leaves the club. In the case of a Trial or Experience flight, Motor Gliding Experience, L2G, Taster, Group flying, Course and/or any other activity that requires the completion of a Temporary Membership Form, your data will be securely held and destroyed no later than 12 months after completion. We will continue to indefinitely hold limited data in the form of aerodrome flight logs which are a legal requirement for our operation as an airfield.

All personal details associated with feedback and complaints from members of the public will be deleted from club files no later than 12 months after the complaint has been made.

What are your rights under Data Protection Law?

Here is a list of the rights that all individuals have under data protection laws:

- 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

Please note these 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.

Contact Us

If you require further information or wish to exercise your data protection rights as outlined in this document, please email:

info@rattlesdenagliding.com with the subject line clearly stating “*FAO: Data Protection Lead*” followed by your query and contact details in the message body.

Alternatively, you can write to us at the following address:

FAO: Data Protection Lead

Rattlesden Gliding Club, Hightown Green

Bury St. Edmunds

IP30 0SX

We aim to respond to you 14 working days after receipt of your query.