



**To All Members, Volunteers, Subscribers,
Applicants & Stakeholders, of The Air League**

As you may be aware, the law on personal data is changing and new legislation (GDPR) came into effect on 25 May 2018. We are obliged to bring the following to your attention:

Although The Air League will continue to process data on 'legitimate interest' grounds, it would be beneficial if we also had your specific consent to process your data – and to contact you.

PRIVACY NOTICE

This notice applies to all our Members, Subscribers, Donors, Applicants, Volunteers, Associates & All Stakeholders of The Air League

**PLEASE ACKNOWLEDGE THIS PRIVACY NOTICE AND YOUR CONSENT TO THE
COMPANY PROCESSING YOUR PERSONAL DATA AS OUTLINED IN THIS PRIVACY
NOTICE BY RESPONDING
'YES, I AGREE'
TO THIS EMAIL**

**RESPONSE TO THIS EMAIL ALSO SIGNIFIES YOUR CONSENT TO THE PROCESSING OF
YOUR PERSONAL DATA AND FOR THE AIR LEAGUE, TO MAINTAIN CONTACT WITH YOU.**

OVERVIEW

Our Intent. We are committed to safeguarding the privacy of our customers. We will only use the information that we collect about you lawfully and in accordance with current data protection legislation. This Privacy Notice also applies for the Company's associated organisations/trusts/charities, (heretofore referred to as The Company):

- Air League Enterprises
- Air League - Alumni
- Air League – Leading Edge



Changes to Data Protection Legislation. Data Protection legislation is currently going through a period of change. The introduction of the European Union's General Data Protection Regulation (GDPR) and the new British Data Protection Bill that will replace the Data Protection Act is currently passing through Parliament and is the basis of this change. This Privacy Notice is therefore intended to comply with the GDPR but may change over time.

Customers as Data Subjects. In legal terms, customers – ie 'you' - are 'Data Subjects'.

The Data Controller. Mr. Grenville Hodge, Honorary Treasurer, The Air League, is from a legal perspective, classed as the 'Data Controller' (DC).

Data Protection Lead (DPL). The Company's DPL is Mr. Nicholas West, Chief Executive Officer /Company Secretary. The DPL fulfils a number of roles, one of which is to be the primary and independent point of contact for data protection matters. The formal mechanism for customers to raise concerns regarding the processing of personal data is primarily to email: exec@airleague.co.uk or send a letter by registered mail to: Data Protection Lead, The Air League, 3 Whitehall Court, London, SW1A 2EL, at which point the inquiry will be forwarded to the DPL for action. However, verbal enquiries from members or others will be treated appropriately by Company staff members, although a written follow up may be requested if appropriate.

Purpose of Processing Personal Data. We collect personal data primarily to support and administer membership, subscriptions, and your use and engagement with the Company's services (e.g., scholarship/award winners).

Lawful Basis of Processing Personal Data. The lawful basis for processing your personal data is as follows:

- **Consent** - once you have agreed to this Privacy Notice you will be registered for the processing of your personal data based upon your consent.
- **Legitimate Interest** – we will also process your data in pursuit of your legitimate interests as a member and customer/service user of the Company and the legitimate interests of the Company.



Categories of Personal Data Processed. The information we hold should be accurate and up-to-date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies. The type or categories of personal data we will collect about you includes your:

- Title
- Name
- Postal address
- Email address
- Mobile, and/or landline numbers
- Date of Birth
- Financial details in order to process payments where applicable, and all data held is compliant with English Law, PCI-DSS regulations (this is the framework which card processing companies monitor and uphold strict standards to be adhered to for us, the Company, to be allowed to use those services). We also retain, for the purposes of processing direct debits, (or refunds), sort codes, bank account numbers if supplied and authority given.
- Other personal details supplied by you to the Company for the purposes of you being a member or being an end user of our services.
- This notice also applies to student members and applicants who are under the age of 18. However, we will be in touch with these members separately, with a notification for their parents/legal guardians.

Recipients of Personal Data. Your name and contact details will primarily only be used internally within the Company. However, for example, if as part of you undertake attendance at one of our lectures or receptions, we are obliged, for security purposes, to pass some of this information to their security personnel. If, as part of your membership of our organisations, you are the recipient of an award, some of your details will be passed to the organisations which carry out the programme. A further example another example, is, if you place a goods order with us, and it is more expedient to have one of our suppliers send you the goods directly, we would supply them with your data. Additionally, if you purchased



goods, e.g. members' ties, your data would be shared with other of our stakeholders, eg courier service providers.

GDPR states any person whose image is recorded on a CCTV system who, if for example, they attend an event, as part of their membership, or as an award winner visit our trusted partner and supplier premises, has a right to seek and be supplied with a copy of their own personal data from the footage. Access to such footage is only granted to regulated authorities, eg, the Police. The Police (or other such authority) may request footage, and if compelled to do so, we would always ensure it is followed up by a written request on headed paper. Such authorities will often just want to view the footage on the premises of the Data Controller or Processor, this action would not raise any concern for data protection.

Sale or Passing of Personal Data to Third Parties. Other than for specific purposes as required by suppliers/stakeholders (as outlined above), we will not sell or pass your personal data to any commercial or regulatory organisation without your explicit consent.

Transfer of Personal Data Outside the EEA (European Economic Area).

Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you. Once the United Kingdom has exited the EU and/or EEA, English Law will take precedence.

Sensitive Personal Data. We will never collect sensitive personal data about you without your explicit consent and a clear explanation why it is required.

Retention of Personal Data. We will continue to retain your name and other relevant details required to support our historical records.

Data Subject's Rights. Under current legislation, you have a number of Rights which are outlined below:

- **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain:



- Confirmation that your data is being processed (held)
- Access to your personal data (a copy) and
- Other supplementary information that corresponds to the information in this privacy notice.

This information will be provided without charge; without delay and within one month.

To protect your personal data, we may seek to verify your identity before releasing any information, which will normally be in electronic format. As a member this will normally be a simple process, however if the SAR is made from a member living overseas, or former member, or by the relative of a deceased member, then additional verification steps are likely.

- **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. The Company will respond within one month of your request.
- **Right to Restrict Processing.** You have a right to '*block*' or suppress processing of personal data. When processing is restricted, the Company is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.
- **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*'. However, you do have a right to have personal data erased, to prevent processing and retention in specific circumstances:
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing or retention.
 - The personal data was unlawfully processed
 - The personal data has to be erased in order to comply with a legal obligation

During any legitimate retention period, the data will be put 'beyond use' as per the Information Commissioner's official guidelines.



GDPR and Children

The Air League Trust recognises its responsibility to those persons classed as minors for legal purposes under GDPR legislation and that they require specific protection.

The purpose of this is Children may be less aware of risks, consequences, safeguards concerned and their rights in relation to the processing of their personal data. Such specific protections should, in particular apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child. As an organisation, we recognise that the consent of the holder of parental responsibility (including in loco parentis), may be necessary, albeit it, not in all instances.

The Air League Trust may hold information on a child and is entitled to the same rights into how they can access this advice. A parent/guardian/holder of parental responsibility can, in writing and with proof of this relationship, make the same request with the same full rights as the child, subject to safeguarding checks being carried out.

However, they right to this information, this may not apply or affect the rights of the child under current safeguarding legislation.

If you have any further enquiries, please follow the aforementioned process within this notice.

**I CONSENT TO THE COMPANY PROCESSING MY PERSONAL DATA FOR THE PURPOSES
OUTLINED IN THIS PRIVACY NOTICE WHICH I HAVE READ AND CONFIRM I
UNDERSTAND.
I ALSO CONSENT TO THE COMPANY CONTACTING ME BY EMAIL OR OTHER MEANS.**