



THE HONOURABLE COMPANY OF AIR PILOTS

incorporating Air Navigators

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Data Protection Policy

March 2019

Introduction

This is a statement of the data protection policy adopted by the Honourable Company of Air Pilots (the Company) in compliance with the GDPR, which became law on 25 May 2018. It applies to all Company employees and also members of the Company when dealing with personal data and acting on behalf of the Company, or its associated charities: Air Safety Trust, Air Pilots Trust and Air Pilots Benevolent Fund.

In order to operate efficiently the Company needs to collect and use information about its members and employees. This includes current and past members and employees, and may include others with whom we communicate.

The Company regards the lawful and correct treatment of personal information as integral to its successful operation, and to maintaining the confidence of our members and those who we work with. To this end the Company fully endorses and adheres to the principles of the GDPR.

Purpose

The purpose of this policy is to ensure that every employee, and member where applicable, handling personal information in the Company is fully aware of the requirements of the GDPR and complies with data protection procedures and that data subjects are aware of their rights under the GDPR.

Scope: information covered by the GDPR

'Personal Data' covered by the GDPR is essentially any recorded information which identifies a living individual.

Personal Data held by the Company may include individuals' contact information, date of birth, financial details for payment of membership fees or events, education and skills information, marital status, nationality, and brief biography. These are all personal details made available to the Company by an individual member.

Sensitive Personal Data is data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health or condition, criminal offences, or related proceedings. **The Company does not hold any sensitive personal data.**

Rationale: reason for the Company to hold/processes Personal Data

There are lawful grounds for processing personal data under the GDPR. The grounds on which the Company holds and processes personal data are individual consent and/or legitimate interest – of the Company and the member concerned.

The purposes for which the Company, or its associated charities, may use personal data:

- Membership and financial (fees/event payment) management and administration

- Event administration
- Compliance with legal and/or governance obligations and good practice
- Distribution of information to suppliers
- Offering or improving services to members

Responsibility for the Company's compliance with the GDPR

The Company is not required to appoint a Data Protection Officer, which is a legally-qualified post. However, the Data Protection Lead (DPL) for the Company is the Clerk, who has overall responsibility for compliance with the GDPR. But individual members of staff, and members, are all responsible for the proper use of the data they process.

Policy Statement

The principles of the GDPR require that personal information must:

- be processed lawfully, fairly and in a transparent manner ('lawfulness, fairness and transparency')
- be obtained for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- be adequate, relevant and limited to what is necessary ('data minimisation')
- be accurate and, where necessary, kept up to date ('accuracy')
- be kept no longer than is necessary for the purpose ('storage limitation')
- be protected by appropriate technical and organisational measures against unauthorised or unlawful processing, loss, damage or destruction ('integrity and confidentiality')

In order to meet the requirements of the principles the Company will:

- nominate a Data Protection Lead who shall be responsible for, and be able to demonstrate compliance with the principles of the GDPR as outlined above
- fully observe conditions regarding the fair collection and use of information
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- ensure the quality of the information used
- hold personal information on its systems for as long as is necessary for the relevant purpose
- ensure that the rights of people about whom information is held can be fully exercised under the GDPR (these include: the right to be informed that processing is being undertaken; the data subject's right of access to their personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is regarded as wrong information)
- take appropriate technical and organisational security measures to safeguard personal information
- only process information necessary to establish or maintain membership or support its activities
- only process information necessary to provide or administer activities for those who are members, supporters, or those involved in or associated with those activities
- only share the information with people and organisations necessary to carry out the Company's activities
- only keep the information while individuals are members, supporters or otherwise associated with activities and for as long as necessary for member/supporter/activity administration

The Company's responsibilities for data protection and confidential information

The Company will ensure that there is someone with specific responsibility for data protection in the organisation. The nominated person is the Data Protection Lead, who is the Clerk. The Data Protection Lead may be contacted at the Company office:

Air Pilots House, 52A Borough High Street, London SE1 1XN

Telephone: 020 7404 4032 Email: office@airpilots.org

The Company will ensure that:

- everyone managing and handling personal information understands that they are responsible for following good data protection practice
- this policy is available to each member of staff and all members
- everyone managing and handling personal information is aware of their responsibilities with regard to safe-guarding of personal data
- queries about handling personal information are promptly and courteously dealt with and clear information is available to all staff
- the Data Protection Lead approves all changes to policy and procedure

Staff responsibilities for data protection and confidential information - to include members when/where appropriate

- All staff must be aware of the requirements of the GDPR and how the rules apply to them
- All staff have a responsibility to ensure that they respect confidential information in their possession and maintain information security. Disclosure of confidential information gained as part of your employment to a third party, or assisting others in disclosure, will be viewed by the Company with the utmost seriousness
- All staff are responsible for ensuring personal information is kept no longer than is necessary

For further advice, please contact the Data Protection Lead.

Privacy Notice

The Company respects your privacy. The information that you provide us with is used solely and specifically for the administrative purposes of membership of the Company and helps the Company to provide all members with the most relevant information about all activities connected with membership of the Company.

A copy of the Company's Privacy Notice and also its Data Protection Policy can be found on our website: <https://www.airpilots.org/members-pages/>

Subject Access Requests

Under the GDPR individuals have the right to access personal information that the Company may hold about them. If you wish to request such information please email:

office@airpilots.org

Data Protection Complaints Procedure

The Company aims to comply fully with its obligations under the GDPR. If you have any questions or concerns regarding the Company's management of personal data, including

your right to access data about yourself, or if you feel the Company holds inaccurate information about you, please contact the Company's Data Protection Lead (details above).

If you are still dissatisfied, you have the right to contact the office of the Information Commissioner, the independent body overseeing compliance with the GDPR:
<http://www.ico.org.uk>