



# THE HONOURABLE COMPANY OF AIR PILOTS

incorporating Air Navigators

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www.airpilots.org

## PRIVACY NOTICE for members

### OVERVIEW

**Our Intent.** We are committed to safeguarding the privacy of our members. The Company 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 three associated charities:

- Air Pilots Trust
- Air Safety Trust
- Air Pilots Benevolent Fund

**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.

**Members as Data Subjects.** In legal terms, members – ie 'you' - are 'Data Subjects'.

**The Data Controller.** The Honourable Company of Air Pilots (known as the Air Pilots or the Company) is from a legal perspective classed as the 'Data Controller'.

**Data Protection Lead (DPL).** The Company's DPL is the Clerk. 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 members to raise concerns regarding the processing of personal data is primarily to email: office@airpilots.org or send a letter by registered mail to: Dowgate Hill House, 14-16 Dowgate Hill, London EC4R 2SU, 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 your membership of the Company and the aims and purposes of the Company or its associated charities.

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

- **Consent** - once we have received notification from you of your consent, you will be registered for the processing of your personal data based upon this consent.
- **Legitimate Interest** – we will also process your data in pursuit of your legitimate interests as a member of the Company and those 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:

- Name
- Date of Birth
- Postal address
- Email address
- Mobile, and/or landline number
- Financial details for membership subscription purposes
- Other personal details supplied by you for Company membership purposes

If you hold appointments within the Company, we may request further information and retain additional records about you. Additionally, minutes of meetings and records of decisions may include your name and other information about you.

**Recipients of Personal Data.** Your name and contact details will primarily only be used internally within the Company. However, if you contribute to membership or other charitable activities, or participate in a dinner, we will normally have to provide your name and possibly other details to other stakeholders – eg printers or caterers.

**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 charitable 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.

**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 retain your personal data while you are a member of the Company. Upon leaving, we will continue to hold 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 and to prevent processing in specific circumstances:

- When you object to the processing and there is no overriding legitimate interest for continuing the processing
  - The personal data was unlawfully processed
  - The personal data has to be erased in order to comply with a legal obligation
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