

# **Portsmouth Gliding Centre Privacy Policy**

Version 1.0 – July 2022

## **Background**

This privacy 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.

It includes the following sections:-

1. **Who are we and how do you contact us and our Data Protection Compliance Manager?**
2. **What kinds of personal information about you do we process?**
3. **What is the source of your personal information?**
4. **What do we use your personal information for?**
5. **What are the legal grounds for our processing of your personal information?**
6. **When do we share your personal information with others?**
7. **What should you do if your personal information changes?**
8. **For how long is your personal information retained by us?**
9. **What are your rights under data protection laws?**
10. **Contact Us**

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## **1. Who are we and how do you contact us and our Data Protection Compliance Manager?**

Portsmouth Naval Gliding Centre (PNGC) is a registered charity, registration no 1148381. The registered company address is Field Views, Peach Grove, Palestine, Andover, SP11 7EP.

PNGC is based at the Army Aviation Centre Middle Wallop airfields Stockbridge SO20 8DY

Our Data Protection Compliance Manager is siggi Ingason, who can be contacted at [flightbookings@pngc.co.uk](mailto:flightbookings@pngc.co.uk)

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## **2. What kinds of personal information about you 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, address and eMail address

- Date of birth and gender
- Emergency contact details, name and phone number
- Information on type and date of flying medical (where required), and next medical due date
- Date of joining the club, and next subscription date
- Student Pilot Training Record
- Flying record, taken from flight logs. (Glidex)
- Flying status, such as pre-solo, solo, instructor etc.
- Flying awards, such as bronze, silver, gold, diamond badges
- Glider ownership, which privately owned gliders the member owns, has a share in or the rights to fly, and registration details, including Flarm ID, where applicable.
- Flying licences, such as glider pilots licence, PPL, radio licence
- Volunteer roles, e.g. winch driver, launch controller, tug pilot, instructor, and other PNGC duties.
- Flying account entries and balance
- Bookings for flying, rostered duties, and social events
- Competition entries
- Accident / incident reports
- CCTV footage.
- Complaints and concerns from local residents.

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### **3. What is the source of your personal information?**

We'll collect personal information from the following sources:-

- From you directly, e.g. from membership and renewal documents, booking system entries including members details held in Glidex
- Login information to the members section of the PNGC website.
- Information generated about you when you fly with us, e.g. flying logs, flying account, training record in the training record card as well as Glidex.
- Information generated about you on the roster system, e.g. future rostered duties, duty swaps etc.

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### **4. 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 structured and comprehensive training
- Ensuring that we charge you correctly for the flying you do, and other items you purchase.
- Communicating to you about club news such as upcoming events, and safety matters by email or via the PNGC website, or telephone as appropriate. This also covers the use of other communications media like WhatsApp.

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## **5. What are the legal grounds for our processing of your personal information?**

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

a) Where it is needed to fulfil our contract with you to provide you with our products and services, such as:

- maintaining our membership database in Glidex.
- keeping accurate member accounts and financial records in Glidex
- maintaining flight instruction records using the appropriate facilities such as the training record card.
- keeping a record of our member's skills and voluntary activities
- providing club social activities
- Informing our members of safety matters, operational matters and upcoming events using any of the clubs communication methods.

b) To comply with our legal obligations, such as:

- Keeping accurate flight logs.
- Holding medical information to ensure fitness to fly
- Keeping accurate financial and tax accounts
- Holding training records

c) Where it is in our legitimate interests to do so, such as:

- continuing to improve the club for the service of all its members.
- to administer good governance of the club

d) With your consent (particularly for ex members and non-members who may have taken an introductory 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, and hopefully fly with us in the future.

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## **6. When do we share your personal information with others?**

We share personal information with the following third parties for the following reasons:

- 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 information on whether or not pilots have up to date medicals 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 on the club noticeboard and website.
- Phone numbers and eMail addresses are shared with other members on the club roster system to make it easier for members to change roster duties.
- Member photographs, eMail addresses and a list of who does what at the club (along with their eMails and phone numbers) are shared on the members' section of the club website, to make it easier for members to get to know each other and to make contact if needed.
- Information on glider trailers is shared amongst members to enable trailers to be parked in the correct locations and for organising retrieves.

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## **7. What should you do if your personal information changes?**

You should tell us so that we can update our records by contacting the club membership secretary via email [memsec@pngc.co.uk](mailto:memsec@pngc.co.uk)

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## **8. For how long is your personal information retained by us?**

Once you have advised us that you are leaving PNGC or if you do not renew your membership to PNGC, we will delete the following data within 180 days of a member leaving the club:-

- Access to the PNGC members section of the website
- Any WhatsApp groups
- Any data relating to your membership in Glidex.

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## **9. What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They 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. The right of data portability is only relevant from May 2018.

- 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 at <https://ico.org.uk>

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## **10. Contact Us**

If you have any questions about this privacy policy or if you wish to exercise your rights or contact our Data Protection Compliance Manager, you can contact us by eMailing us at [Flightbookings@pngc.co.uk](mailto:Flightbookings@pngc.co.uk)