



EAST SUSSEX GLIDING CLUB

GDPR Statement

Important Information Please Read

From May 25th, 2018 changes to the law will be implemented. To make sure you fully understand how we use your personal data this document explains how we hold and manage the privacy of your private data.

This update doesn't change anything, and you do not have to do anything. We have created this document to keep you informed.

Privacy Notice

The General Data Protection Regulation law in the UK and EU becomes effective on the 25th May 2018. This notice sets out your rights as a member or Glider Flight Experience customer or as a visitor to our website, under the new law.

This privacy notice tells members, Glider Flight Experience customers and website users what to expect when East Sussex Gliding Club Ltd collects, uses, retains and discloses your personal information. Personal information is information that (on its own or together with other information) identifies you and is about you. This includes what you tell us about yourself and what we learn by having you as a member or customer.

WHO WE ARE

East Sussex Gliding Club Ltd referred to as ESGC (or 'we', 'us', or 'our') is a Sport and Social Club registered at Kitsons Field, The Broyle, Ringmer, East Sussex BN8 5AP. To ensure that we process your personal information fairly and lawfully this notice informs you:

- Why we need your personal information
- How it will be used
- With whom it will be shared
- What rights you have in relation to your personal information

Within this notice we describe instances where ESGC is the 'data controller' (the organisation who decides what personal data is collected and how it is used).



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There may be situations where ESGC processes data on the instructions of another organisation (known as acting as a 'data processor') but in those circumstances our use of data would be governed by that organisation.

OUR COMMITMENT TO YOUR PRIVACY

ESGC recognises the importance of protecting personal data and confidential information in all that we do and takes care to meet our legal duties. ESGC puts in place all reasonable technical, security and procedural controls required to protect your personal information for the whole of its life, in whatever format we hold that information.

A legitimate interest is when we have a business or commercial reason to use your information but this must not unfairly go against your rights or freedoms. If we rely on our legitimate interest we will tell you what it is.

Below is a list of the ways that we may use your personal information, and which of the reasons we rely on to do so. This will also tell you what our legitimate interests are.

What We Use Your Personal Information For	Our Reason(s) For Processing	Our Legitimate Interests (Where Applicable)
<ul style="list-style-type: none"> To manage our relationship with you To communicate with you about your Membership or purchased products To conduct analysis activities to improve or develop our services To analyse the reaction to our advertising activity 	<ul style="list-style-type: none"> Fulfilling contracts Our legal duties Your consent Our legitimate interests 	<ul style="list-style-type: none"> Keeping records up to date Seeking your consent when we need it to contact you Be efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> To administer payments to us or made by us relating to membership To administer payments relating to product sales 	<ul style="list-style-type: none"> Fulfilling contracts Our legal duties Our legitimate interests 	<ul style="list-style-type: none"> Be efficient about how we fulfil our legal and contractual duties Complying with regulations that apply to us



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<ul style="list-style-type: none"> To manage risk for us and our members or customers To comply with regulations that apply to us To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> Fulfilling contracts Our legal duties Our legitimate interests 	<ul style="list-style-type: none"> Complying with regulations that apply to us Be efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit 	<ul style="list-style-type: none"> Our legal duties Our legitimate interests 	<ul style="list-style-type: none"> Complying with regulations that apply to us Be efficient about how we fulfil our legal and contractual duties
What We Use Your Personal Information For	Our Reason(s) For Processing	Our Legitimate Interests (Where Applicable)
<ul style="list-style-type: none"> To exercise our rights as set out in agreements or contracts. 	<ul style="list-style-type: none"> Fulfilling contracts 	

WHAT TYPES OF PERSONAL INFORMATION DO WE HANDLE

We process information to support the provision of services to members and customers, to maintain our own accounts and promote services.

Types of personal services we use include:

- Personal details such as names, addresses, telephone numbers, date of birth;
- Next of kin information such as names, addresses, telephone numbers of such persons;
- Financial details including payments made to or received from ESGC by members and customers
- Details of how you interact to our website;
- Details of when you contact us, and we contact you including copies of written communications such as emails or letters;
- CCTV images, which may be used for site security; • Details of services and products you have purchased.



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WHERE WE COLLECT PERSONAL INFORMATION FROM

We may collect your personal information from the following sources:

- Personal information you give to us:
 - When you join ESGC you complete a Membership Application Form
 - When you become a temporary member, you complete a Temporary Membership Form
 - When you contact ESGC by phone, email or letter.
 - When you use our services
 - When you join our website as a member.
 - Optionally we hold your bank details to enable us to use Banks Automated Clearing Services (BACS)
- Personal information gathered from our website
 - When you contact us via the contact area at the foot of each page
 - When you complete a request form for goods or services
- Personal information from third parties that we work with
 - We do receive limited information from bank payment services

IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

We may need to collect personal information by law or under the terms of the contract we have with you.

If you choose not to give us this personal information it may delay or prevent us from meeting our obligations. It may also mean that we cannot provide services under our membership or other services purchased from us. We will notify you if your choice not to give us personal information would result in a delay or prevent us from meeting our obligations.

Any personal information that is optional will be clearly marked at the point of collection.

WHOM WE SHARE YOUR PERSONAL INFORMATION

Certain services are provided by third party who collect and use personal information in order to provide those services to you. They are known as our 'joint data controllers' under data protection law. This means they have a separate responsibility to protect your personal information and will keep you informed about how your personal information will be used.

These types of organisations are:

- Online payment service providers.
- HM Revenue and Customs, our regulators and other authorities (where required or permitted by law)



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In the usual course of our business we may use other third-party organisations known as 'data processors' under data protection law to support the essential delivery of our services. These organisations process your personal information on our behalf.

These types of organisation are:

- Mailing or email service providers
- Providers of business services such as auditors, consultants, solicitor and/or insurers

When we share your information with our approved third-party providers, our contractual relationship with them prevents them from using your information for any purpose outside of our instructions to them. They may use their own third-party data processors, but they are always required to meet the same legal requirements as ESGC does.

KEEPING YOU INFORMED

We will use your personal information to contact you via email and online mailshot to inform you of changes to

- Services provided by ESGC
- Changes to membership conditions temporary or otherwise
- Notification of important meetings
- Events

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

We will keep your personal information for as long as you are a member of ESGC, this will include temporary members.

After you stop being a member

We may keep your personal information for up to 6 years for one of the following reasons

- To respond to questions or complaints
- To show we treated you fairly; or
- To maintain records according to legal requirements and documented business need

We may keep your personal information for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons. In these circumstances we will make sure that your privacy is protected and only use it for legal or regulatory purposes

Your Rights

In order to exercise your rights under data protection law we will need to verify your identity for your security



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You can contact us by emailing accounts@sussexgliding.co.uk or by writing to the

Data Protection Officer
East Sussex Gliding Club Ltd
Kitsons Field
Ringmer
East Sussex
BN8 5AP

HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

You can request a copy of your personal information as well as why we have this personal information, who has access to that personal information or where we got that personal information from at any time. Once we have received your request we will respond within 30 days.

LETTING US KNOW IF YOUR PERSONAL INFORMATION NEEDS UPDATING

You have the right to question any information we hold on you that you feel is wrong, out of date or incomplete. If you do, we will take reasonable steps to check its accuracy and correct it.

IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and the 'right to erasure' (or 'right to be forgotten')

We may be able to restrict the use of your personal information so that it may be used for certain things, such as legal claims or to exercise legal rights. In this situation we would not use or share information in other ways while restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it;
- It is not relevant any more, but you want us to keep it for use in legal claims; or
- You have already asked us to stop using your personal information, but you are waiting for us to assess your request and confirm whether we are permitted to continue using the personal information under data protection law.

If you want to object to how we use your personal information, or ask us to restrict how we use it please contact us using the details above



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IF YOU WANT US TO ERASE YOUR PERSONAL INFORMATION

If you feel we should no longer be using your personal information, or that we are illegally using your data, you can request that we erase the personal information we hold on you. When we receive your request, we will confirm whether the personal information has been deleted or tell you the reason why it cannot be deleted. There may be legal reasons why we need to keep your personal information.

If you want to request that we erase your personal information, please contact us using the details above

YOUR RIGHT TO COMPLAIN

If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you can complain to the Information Commissioner's Office (ICO) by emailing casework@ico.org.uk or telephoning 0303 123 1113. Additional contact methods are detailed on their website <https://ico.org.uk/global/contact-us>