

HEREFORDSHIRE GLIDING CLUB PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice explains how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you are a member of our club. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection we will be the controller of any of your personal information.

The Club Membership Secretary has overall responsibility for data protection compliance in our organisation.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you register for with us, we may hold **personal information** about you, including your:

- personal contact details such as name, title, home and email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at our activities;
- images in video and/or photographic form and voice recordings;
- details of next of kin, family members and emergency contacts;
- any disciplinary and grievance information;

2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use “**special categories**” of more sensitive personal information such as information about your race or ethnicity, religious beliefs and sexual orientation;

In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

3. **WHERE WE COLLECT YOUR INFORMATION**

We collect personal information about our members when you apply to become a member of the club, when you take part in club activities, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer your membership and managing our relationship with you, including dealing with payments and any support or service enquiries made by you	Contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This enables us to manage and administer your membership contract with us.
To send you marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership and events	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records while they may be required in relation to complaints or claims. We need to retain records in order to administer and manage your membership and run our club and in some cases we have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
The security & proper use of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure and are being used in an appropriate manner in relation to content and access to websites and that this complies with relevant laws and club policies.
To conduct studies to understand club activities, attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant in the interests of the future development of the club and in the interests of all members.

For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance and other information	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on to and manage and administer your attendance on the course and/or programme.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
HAC & other relevant airfield users	Information about individuals' flying and airfield activities	We have a legitimate interest in doing so to provide a safe and fair environment for all members

Note regarding the withholding of personal information

For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **The British Gliding Association:** to allow them to administer the sport.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- **HAC & other relevant airfield users,** as required for safety and the proper running of the airfield, as required by the CAA.

6. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will depend on the type of information and the reason why we collected it from you. In some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of six years after your last contact with us or the end of your membership.

An exception to this rule is

Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes.

7. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they may not apply to personal information recorded and stored by us. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

8. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

9. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email office@shobdongliding.co.uk or write to us at Herefordshire Gliding Club, Shobdon Airfield, HR6 9NR.