#### **SMFC CONSTITUTION**

#### ANNEX G

#### PERSONAL DATA POLICY

Reference: General Data Protection Regulations, May 2018

### **Privacy Notice**

At the Salisbury Model Flying Club, hereafter referred to as "The Club", we are committed to protecting and respecting your privacy. We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager has overall responsibility for data protection compliance in our Club. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

This notice explains when and why we collect personal information about people who join the Club by whatever means, how we use it, the conditions under which we may disclose it to others and your rights in relation to your personal data. Any changes to this policy will be endorsed by the next General Meeting.

By becoming a member of the Club, you are agreeing to be bound by this notice. Any questions regarding this notice and our privacy practices should be addressed to the SMFC Membership Secretary.

## How do we collect information about you?

We obtain information about you when you apply to become a member of the Club.

#### What type of information is collected about you?

The personal information we collect might include your name, address, email address, telephone number, gender, your nominated emergency contact and IP address.

The legal basis for processing your personal data is to enable the Club to fulfil our contractual obligations and to provide membership services.

### **How is your information used?**

We may use your information to:

- Process your membership;
- Carry out our obligations arising from your membership
- Seek your views or comments on matters relating to the Club and model aircraft flying
- Notify you of changes to our services
- Send you communications which you have requested and that may be of interest to you

These may include information about Club events and contests and other Club related matters, also information from the BMFA that may be of interest.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, SMFC will be the "controller" of all personal data we hold about you.

## How long do we retain your information?

We will hold your personal information on our systems for as long as is necessary to carry out our obligations in relation to your membership, or as long as is set out in any relevant agreement between us. Where an individual person's Club membership lapses, your information will be securely kept for a further period of 12 Months, after which your information will be deleted.

## Who has access to your information?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. All members of the Club must also be members of the BMFA; by joining the Club you give consent for your personal data to be shared with the BMFA to enable provision of BMFA membership services. Please see the BMFA privacy policy at https://www.bmfa.org/Privacy-Policy. Be assured that we will not release your information to third parties beyond the Club unless we are required to do so by law, for example, by a Court order or for the purposes of prevention of fraud or other crime.

### How you can access and update your information?

The accuracy of your information is important to us. You can check the information we hold is correct on the Members' Dashboard area of the BMFA website and update the information if necessary directly through that website, or by email to SMFC Membership Secretary.

### What are your rights?

#### (a) The right to access:

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

# (b) The right to rectification:

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

## (c) The right to erasure:

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

• The personal data being no longer necessary in relation to the purposes for which the data was collected or otherwise processed, you are no longer a Club member and wish the data not to be held for our standard 12 Months.

**Note:** Please note that a request for data erasure for a current member would require that member to forfeit membership. The data is required for the Club to fulfil its obligations.

# (d) The right to restrict processing:

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- You contest the accuracy of the personal data
- Processing is unlawful but you oppose erasure
- We no longer need the personal data for the purposes of our processing, but you require

personal data for the establishment, exercise or defence of legal claims, and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent:

- For the establishment, exercise or defence of legal claims
- For the protection of the rights of another natural or legal person
- For reasons of important public interest

## (e) The right to object to processing:

You have the right to object to our processing of your personal data for direct electronic communications purposes. If you make such an objection, we will cease to process your personal data for this purpose.

**Note:** Denial of use of your personal data will inevitably isolate you from any club information.

#### (f) The right to data portability:

To the extent that the legal basis for our processing of your personal data is that the processing is necessary for the performance of a contract to which you are party and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

#### (g) The right to complain to a supervisory authority:

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioners Office. https://ico.org.uk

#### (h) The right to withdraw consent:

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us OR by using your BMFA Members Dashboard when logged into their website.

**Note:** Please note that a request for data erasure for a current member would require that member to forfeit membership. The data is required for the Club to fulfil its obligations.

#### **Contacting Us**

All requests arising from this Data Protection Policy should, in the first instance, be directed to the SMFC Membership Secretary.