

DATA PROTECTION POLICY

The Data Protection Act 1998 (the Act) protects an individual's personal information. It gives him the right to see the personal information held about him, and to correct it if it is wrong.

It requires persons processing personal data to follow eight data protection principles. Those principles are set out below, with an explanation of how the Ulster Gliding Club Limited (the club) complies with them.

1.1 The first principle: personal data must be processed fairly and lawfully, and- (a) at least one condition in Schedule 2 to the Act must be met, and

(b) for sensitive personal data, at least one condition in Schedule 3 to the Act must also be met.

1.2 The data are so processed and a condition in Schedule 2 to the Act (and for sensitive personal data, in Schedule 3) is satisfied, since-

- (a) The processing is necessary for the performance of the member's contract with the club (satisfying the condition in paragraph 2 of Schedule 2); or
- (b) Where data are shared with any person other than a club member, the club member has consented to the sharing (satisfying the condition in paragraph 1 of Schedule 2); or
- (c) Where the data of a member's emergency contact are processed, that contact has agreed to the club doing so (satisfying the condition in paragraph 1 of Schedule 2);
- (d) Where the data are sensitive personal data (mainly about a member's fitness to fly), the club member has consented to the processing (satisfying the condition in paragraph 1 of Schedule 3).

1.3 The club provides members with the following information (to satisfy paragraph 2 of Schedule 1 (amplifications of the first principle))-

- (a) The identity of the data controller (the club);
- (b) The purposes for which data are intended to be processed

2.1 The second principle: personal data must be obtained only for specified and lawful purposes and not be processed in a manner incompatible with those purposes.

2.2 Data are processed only for the purpose of running the club or to help the club. These purposes include-

- Contacting members about club activities or for club purposes;
- Keeping membership lists and fees incurred up to date;
- Sending invoices to members for fees incurred;
- Sending reminders to members about the renewal of medical or insurance certificates;
- Providing club officers and persons performing a function for the club with the data of members;
- Sharing data with persons (such as the club's governing body, the British Gliding Association) who are not club members in accordance with paragraph 2.4;
- Sending data about club officers to the British Gliding Association;
- Keeping a register of members, and past members, as required by the Companies Act;

Keeping a register of directors and the secretary, and of directors' residential addresses, as required by the Companies Act;

Sending data about directors and the secretary to the registrar of companies, as required by the Companies Act.

2.3 If a member does not restrict the sharing of his address, email address or telephone number the club may make them available to any other member for club purposes on request.

2.4 The club may share a member's personal data with any person who is not a club member if the member specifically consents.

3.1 The third principle: personal data must be adequate, relevant and not excessive.

3.2 The club only processes -

Data supplied to it by each member, including his name, address and other contact details;

Data relating to a member's flights;

Data in any medical certificate or statement supplied by a member to the club;

Data in any insurance certificate supplied by a member to the club for any glider flown from the club's airfield;

Data about a member's emergency contact, for which the member has obtained that person's consent.

4.1 The fourth principle: personal data must be accurate and, where necessary, kept up to date.

4.2 The club endeavours to meet this principle so long as it is supplied it with the correct data.

A member has the right to ask for details of the data which the club holds on him.

A member's emergency contact has the right to ask for details of the data which the club holds on him.

The club intends to make no charge for providing this information.

Any request for such details should be sent to the secretary.

5.1 The fifth principle: personal data must not be kept longer than necessary.

5.2 When a member resigns, the club removes his data from its lists one year after he resigns.

Where the club is notified of a member's death, it removes his data from its lists within two months of being so notified.

In order to comply with a grant condition applied by Sport NI, the club keeps a temporary member's data for one year after the 31st March following the date on which his membership ceases.

The club needs data in these circumstances to enable it to analyse its membership statistics.

5.3 Paragraph 5.2 does not apply to any register required to be kept under the Companies Act.

6.1 The sixth principle: personal data must be processed in accordance with a person's rights under the Data Protection Act 1998.

6.2 These rights include the enjoyment of privacy and the knowledge that the club will only use data for an authorised purpose.

7.1 The seventh principle: measures must be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

7.2 Members' personal data are held on the following computers and electronic media-

Clubhouse PC – financial transactions and flying logs at a minimum.

Clubhouse PC – Logstar is not password protected: financial records and flying logs are visible;

- The treasurer and membership modules are password protected;
- The PC is networked to the internet, but is protected by the hardware firewall inside the router;
- Logstar and the treasurer's and membership data are backed up to a remote site (being encrypted before transmission).

Launch point laptop – Logstar is not password protected: it contains financial transactions and flying logs at a minimum.

A working copy of Logstar is stored on a memory stick. This is transferred between the clubhouse PC and the launch point laptop as appropriate.

A copy of Logstar is copied to the launch point laptop when Logstar is shut down.

A copy of Logstar is copied to the clubhouse PC when Logstar is shut down. This protects against failure and loss of the memory stick between the launch point and the clubhouse.

The treasurer's accounts package is password protected. The treasurer takes backups of this package.

Computer equipment belonging to club officials – names, addresses, dates of birth, email addresses, financial records, next of kin, insurance and medical renewal information.

7.3 Paper copies of members' personal data are held by the chairman, secretary, treasurer, field treasurer, assistant secretary and child protection officer at their homes.

These copies are held in locked filing cabinets, and shredded or burned when no longer needed.

7.5 As required by the Companies Act, the following registers are held at the club's registered office-

a register of club members (including former members);
a register of the club's directors (including former directors) and of directors' residential addresses;
a register of the club's secretaries (including former secretaries).

7.4 Personal data relating to members' emergency contacts are held on paper at the clubhouse for immediate access in case needed.

8.1 The eighth principle: personal data must not be transferred to a country outside the European Economic Area, unless it ensures an adequate level of protection for the rights of data subjects.

8.2 The data have not been, and will not be, transferred to such a country.

General

9. If a member has any issues with any of the above, he should contact the secretary.

10. In this Policy words importing the masculine gender include the feminine.

11. This Data Protection Policy will be sent to members.

12. This Policy was approved by the committee of the club on 18 May 2010.

It will be reviewed no later than 21 October 2015