

Privacy Policy & GDPR

At we are committed to ensuring and protecting your privacy at any time you are on our website or communicate electronically with our personnel. Our Privacy Policy is contained below and provides a detailed explanation as to how we may use your personal information provided to us or any we collect through legal means.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We do occasionally update this policy so please refer back to it in the future.

Definitions and Interpretation

"Ulster Gliding Club Ltd"	Registered Office: PFS & Partners Ltd., 16 Main Street Limavady, Limavady, County Derry, BT49 0EU
"We/Us/Our"	means Ulster Gliding Club Ltd (See above).
"Account"	means an account required to access and/or use certain areas and features of Our group of sites.
"Cookie"	means a small text file placed on your computer or device by Our Site(s) when you visit certain parts of Our Site(s) and/or when you use certain features of Our Site(s). Details of the Cookies used by Our Site(s) are set out below.
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.
"Personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site(s). This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 OR EU Regulation 2016/679 - the General Data Protection Regulation ("GDPR").

Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you (see section - How to access your data);
- The right to rectification if any personal data We hold about you is inaccurate or incomplete (please section - How to rectify data or contact Us);
- The right to be forgotten - i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in the section below (How we use Your data)
- The right to restrict (i.e. prevent) the processing of your personal data.

- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation).
- The right to object to Us using your personal data for particular purposes.
- Rights with respect to automated decision making and profiling.

The processing of your data is either based on your consent or in case the processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract, ref. GDPR art. 6(1)(a)-(b).

If the processing is based on your consent (An example of which is email marketing), you may at any time withdraw your consent by either updating your preferences or by contacting us directly.

In order to enter into a contract regarding the purchase of Our service(s), you must provide us with the required personal data. If you do not provide Us with all the required information, it will not be possible to provide those service(s).

If you have any cause for complaint about Our use of your personal data, please contact Us and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

Information We Collect from You

Data can be collected and processed for legitimate interests when our site/s are in operation by you. The following are approved methods of collection:

- If you register for information or complete a purchase, by filling out a form we can collect the information provided.
- Corresponding with us by phone, e-mail, support ticket or otherwise.
- Traffic data, weblogs, location data, and any other communication can be collected. These details come from your visit to our site and any services / resource tools you use while on the site. See section on Cookies in addition
- Any communication on our website or to personnel allows us to collect information.

The information collected is dependent on your activity but could be from the following datasets:

- Your name
- Business / Company Name
- Title
- Contact information [Address, Email addresses, telephone numbers]
- Financial payment method
- Your Opted In & Out preferences regarding methods & types of communications
- IP Address
- Web browser type and version, including OS type and version
- Access & Activity logs, including full URLs, click to & through data, Site(s) search data, response times and errors. (Reference Privacy & Electronic Communications Regulations 2003 & Investigatory Powers Act 2016)

Please note we use third party payment gateways for online invoices and therefore do not collect credit/debit card information.

How we use Your data

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Act 1998 and GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. We may use your data for the following purposes:

- Providing and managing your Account.
- Providing and managing your access to Our Site(s)
- Personalising and tailoring your experience on Our Site(s)
- Personalising and tailoring Our products and/or services for you
- Supplying Our products and/or services to you (please note that We require your personal data in order to enter into a contract with you)
- To conduct manual or systematic monitoring for fraud and other harmful activity
- To process payments with our payment gateway companies (PayPal & BACS)
- Replying to emails from you
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time)
- Supplying you with emails about the product(s) and/or service(s) you have (E.g. usage stats, summary digests, how to use the service)
- Market research & communications
- Analysing your use of Our Site(s) and gathering feedback to enable Us to continually improve Our Site(s) and your user experience
- For audits, regulatory purposes, and compliance with industry standards

With your permission and/or where permitted by law, We may also email you, from time to time, with news and offers on Our products and/or services.

We will not, however, send you any unsolicited marketing and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998, GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties (E.g. partner/resellers and analytics, etc) whose content appears on Our Site(s) may use third party Cookies. Please refer to the section on Cookies below for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

How we store your data

We only keep your personal data for as long as We need to for legitimate and lawful purposes. All information you provide to us is stored on our secure servers. We use third party payment gateways and so do not store any card details.

The majority of your data will be stored within the European Economic Area ("the EEA"), however some of your data may be stored outside of the EEA (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 1998 and GDPR.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Do we share your data?

Some of your personal data is passed to third parties during order processing. For example, providing your personal data to a payment gateway provider for invoice fulfilment, or providing your personal data for fraud checks during the order processing.

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a government authority.

We may compile statistics about the use of Our Site(s) including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you.

The third-party data processors used by Us, which could be located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 1998 and GDPR.

How Can You Control Your Data?

You have choices regarding our use and disclosure of Your Personal Data:

- Opting out of receiving electronic communications from us. If You no longer want to receive marketing-related emails from us on a going-forward basis, You may opt-out via the unsubscribe link included in such emails or by updating your opt-in/opt-out status in your personal settings of the site(s). We will try to comply with Your request(s) as soon as reasonably practicable.

Please note that if You opt-out of receiving marketing-related emails from us, we may still send You important administrative messages that are required to provide You with our Services.

- How You can access or change Your Personal Data. If You would like to review, correct, or update Personal Data that You have previously disclosed to us, You may do so by signing in to your account or by contacting us.

If emailing us Your request, please make clear in the email what Personal Data You would like to have changed. For Your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that You use to send us Your request, and we may need to verify Your identity before implementing Your request. We will try to comply with Your request as soon as reasonably practicable.

Your Right to Withhold Information You may access certain areas of Our Site(s) without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies, see the below section. However, some of the site(s) need cookies to provide You certain features and functions.

Your right to be forgotten

You have the right to request that We delete your personal data at any time unless that data is necessary for us to provide you with services or We are required to retain it to fulfil Our legal obligations. (E.g. financial information is retained for 7yrs - reference UK HMRC Tax laws)

Retention Period

We will retain Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Please note that we have a variety of obligations to retain the Data that You provide to us, including to ensure that transactions can be appropriately processed, settled, refunded or charged-back, to help identify fraud and to comply with anti-money laundering and other laws and rules that apply to us and to our financial service providers.

Use of Services by Minors

We are in compliance with the requirements of the Children's Online Privacy Protection Act. We will not intentionally collect any information from anyone under 13 years of age. Our services are not directed to individuals under the age of thirteen (13).

Payment Gateways

To protect your payment details We do not store card information. We use the below third-party payment gateways.

PayPal, payments made via the PayPal gateway can be either with or without a PayPal account, including credit and debit card payments.

BACS, for selected customers payment by BACS is possible.

In order to process your payment, it is necessary to pass some of your personal data (name, address and purchase details) to the third-party payment provider.

Cookies

What is a cookie?

Most websites you visit will use cookies in order to improve your user experience by enabling that website to remember you, either for the duration of your visit using a session cookie or for repeat visits using a persistent cookie.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier. Websites that don't use cookies will treat you as a new visitor every time you move to a new page on the site.

Without a cookie when you enter your login details and move to another page it won't recognise you and it won't be able to keep you logged in. Some websites will also use cookies to enable them to target their advertising or marketing messages based for example, on your location and/or browsing habits.

Our use of cookies

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your device using a session cookie. The cookie cannot be used to identify you personally but is used to make your experience on our site safe, authenticated and unique.

For example:

- enabling a service to recognise your device so you don't have to give the same information several times during one task
- recognising that you may already have given a username and password so you don't need to do it for every web page requested
- measuring how many people are using services, so they can be made easier to use and there's enough capacity to ensure they are fast

In addition to our session cookies (mentioned above) we also use Google Analytics to monitor our website statistics. Google Analytics sets session cookies to help us accurately estimate the number of visitors to the website and volumes of usage. This to ensure that the service is available when you want it and fast. For more information about Google Analytics visit [Google Analytics website](#).

The facts collected about you are statistical only. No identifying information will be shared about our visitors and how they made use of our site. No personal details will ever be shared.

Categories of cookies

We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide.

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most. No information that identifies you is kept.

- Functionality cookies remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. They are anonymous.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

Name	Category	Purpose	Expiry
MyEngineCI	Strictly Necessary	My-Engine Portal cookie is used to allow core functionality.	Session duration
page_scroll	Functional	My-Engine Portal cookie that is used for page scrolling and pagination.	Session duration
sideBarState	Functional	My-Engine Portal cookie that remembers the state of the portal side menu.	Session duration
PHPSESSID	Strictly Necessary	The PHP Session cookie is native to PHP and enables the site(s) to store site data.	Session duration
WHMCSUID WHMCSPW	Functional	These 2 cookies are used for the remember functionality of the clients/billing area.	Session duration
SWIFT_client	Functional	This cookie is used for using and accessing the support area.	Session duration
SWIFT_visitorsession	Functional	This cookie Is required for the chat functionality on the website.	Session duration
SWIFT_visitor	Functional	This cookie is used for using and accessing the support area.	Session duration
SWIFT_sessionid80	Functional	This cookie is used for using and accessing the support area.	Session duration
_utma	Performance	Google Analytics tracking cookie used to distinguish users and sessions.	2 years
_utmb	Performance	Google Analytics tracking cookie used determine new sessions and visits	30 min
_utmc	Performance	Google Analytics tracking cookie used for interoperability	Session duration
_utmz	Performance	Google Analytics tracking cookie used to explain how the user reached the site(s)	6 months
_utmt	Performance	Google Analytics tracking cookie used to throttle request rates	10 minutes
_gat	Performance	Google Analytics tracking cookie used to throttle request rates	1 min
_gid	Performance	Google Analytics tracking cookie used distinguish visitors	24 hours
_ga	Performance	Google Analytics tracking cookie used distinguish visitors	2 years

Removing and disabling cookies

If you do not wish to accept cookies on to your machine you can disable them by adjusting the settings on your browser. However, this will affect the functionality of the websites you visit.

Links to other websites

Our site(s) may contain links to other websites of interest. However, once you have used these links to leave our site(s), you should note that we do not have any control over that other site. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such site(s) are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information at any time. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by using the opt-out/unsubscribe in the message or updating your personal preferences. Alternatively, you can also do so by writing to or emailing us.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. You may request details of your personal information which we hold about you under the Data Protection Act 1998 and GDPR. If you believe that any information we are holding about you is incorrect or incomplete, please write to us or email us as soon as possible and we will promptly correct any information found to be incorrect.