



# DATA POLICY

POLICY PREPARED BY:	Lizzie Harrocks
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The Aviation Environment Federation (AEF) needs to gather and use certain information about individuals. This can include members of the Federation, donors, event attendees, interested parties and other people the organisation has a relationship with or may need to contact.

Personal information means information relating to living individuals who can be identified from that information, such as names, email addresses, personal home addresses, personal phone numbers, personal descriptions, etc. (“Personal Information”).

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards – and to comply with the law.

The AEF (“we”, “our”, “us”) is committed to protecting and respecting Personal Information. We will treat Personal Information securely.

We are the data controller for the purpose of the Data Protection Act 1998 and the General Data Protection Regulation (Regulation (EU) 2016/679) (“Data Protection Legislation”).

If you have any questions, comments and requests regarding your Personal Information (including how to object us to processing your Personal Information) please contact: [info@aef.org.uk](mailto:info@aef.org.uk).

If you are unhappy with how we handle your Personal Information, and we cannot resolve it to your satisfaction, you can notify the Information Commissioner’s Office (ICO) by calling their helpline on: 0303 123 1113.

## DATA PROTECTION LAW

The Data Protection Act 1998 describes how organisations – including the AEF – must collect, handle and store Personal Information.

These rules apply regardless of whether data is stored electronically, on paper or any other materials.

To comply with the law, Personal Information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal information must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not to be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## WHY THIS POLICY EXISTS

This data protection policy ensures the AEF:

1. Complies with data protection law and follows good practice
2. Protects the rights of members, supporters, staff and other interested individuals
3. Is open about how it stores and processes individuals' data
4. Protects itself from the risks of data breach

## SHARING YOUR DATA WITH THE AEF

The following sections detail the various ways that the AEF collects and uses the personal data you share with us, the purpose(s) we use the data for, and the legal basis for processing your data for the intended purpose(s).

In some cases Legitimate Interest is used as the Legal Basis and if you would like to know more about how we came to this conclusion please contact [info@aef.org.uk](mailto:info@aef.org.uk).

## BECOMING A MEMBER OF THE AEF

This section sets out the Personal Information we collect about our members, the purpose(s) for which we use your Personal Information and the legal basis for processing your data.

## PERSONAL INFORMATION COLLECTED

### CARD & BANK ACCOUNT DETAILS

1. Card & bank account details are collected by our secure third party payment processors (Please note that for security reasons, card and bank details are not seen or stored by the AEF).

### MEMBERSHIP INFORMATION

1. The amount you wish to pay, the frequency of payments, the start date, the end date, whether you have been a member before and whether there are any issues or airfields or airports in which you have a particular interest.

### CONTACT DETAILS

1. Your email address(es), home address and telephone number(s).

## WHAT WE DO WITH YOUR DATA

### CARD & BANK ACCOUNT DETAILS

1. This data is used to process your membership payment (Please note that for security reasons and PCI Compliance; card and bank details are not seen or stored by us).

### MEMBERSHIP INFORMATION

1. This information is used as a record of your membership and to enable us to process your membership subscription. It also allows us to inform you when you are due to renew your membership. We also want to send you the most relevant information that we can in the most efficient way possible, so in order to work out who to contact, what to say and when to get in touch, we analyse your membership information.

### CONTACT DETAILS

1. Your email address is used so that we can send you confirmation of your membership.
2. If you have provided your consent, your contact details are also used to provide you with updates on our campaigns, as well as events and information that we think are relevant to you.

## LEGAL BASIS

### CARD & BANK ACCOUNT DETAILS

1. Necessary for the performance of a contract.

### MEMBERSHIP INFORMATION

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your membership information for the purpose outlined and that your fundamental rights are not harmed in doing so.

### CONTACT DETAILS

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your contact information for the purposes outlined and that your fundamental rights are not harmed in doing so.
2. Consent: On the basis of your consent only.

## MAKING A DONATION TO THE AEF

This section sets out the Personal Information we collect about our donors, the purpose(s) for which we use your Personal Information and the legal basis for processing your data.

### PERSONAL INFORMATION COLLECTED

#### CARD & BANK ACCOUNT DETAILS

1. Card & bank account details are collected and passed on to our secure third party payment processors (Please note that for security reasons, card and bank details are not stored by the AEF).

#### DONOR INFORMATION

1. The amount you wish to donate.

#### CONTACT DETAILS

1. Your email address and home address.

### WHAT WE DO WITH YOUR DATA

#### CARD & BANK ACCOUNT DETAILS

1. This data is used to process your payment (Please note that for security reasons and PCI Compliance; card and bank details are not seen or stored by us).

#### DONOR INFORMATION

1. This enables us to process your donation.

#### CONTACT DETAILS

1. Your email address is used so that we can send you confirmation of your donation.
2. If you have provided your consent, your email address is also used to provide you with updates on our campaigns, as well as events and information that we think are relevant to you.
3. Your home address is used to process your payment (Please note that for security reasons and PCI Compliance; card and bank details are not stored by us and are retained by our payment providers).

#### LEGAL BASIS

##### CARD & BANK ACCOUNT DETAILS

1. Necessary for the performance of a transaction.

##### DONOR INFORMATION

1. Necessary for the performance of a transaction.

##### CONTACT DETAILS

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your contact information for the purposes outlined and that your fundamental rights are not harmed in doing so.
2. Consent: On the basis of your consent only.

#### SUBSCRIBING TO THE AEF'S EMAIL UPDATES

This section sets out the Personal Information we collect about our subscribers, the purpose(s) for which we use your Personal Information and the legal basis for processing your data.

#### PERSONAL INFORMATION COLLECTED

##### CONTACT DETAILS

1. Your first and last name.

2. Your email address.

## WHAT WE DO WITH YOUR DATA

### CONTACT DETAILS

1. We use your name so that we are able to address you personally when we get in contact.
2. We use this to send you the communications you've notified us you wish to receive (online only).

## LEGAL BASIS

### CONTACT DETAILS

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your donation information for the purposes outlined and that your fundamental rights are not harmed in doing so.
2. Consent: On the basis of your consent only.

## APPLY FOR A JOB OR VOLUNTARY POSITION AT THE AEF

This section sets out the Personal Information we collect about our job and volunteer applicants, the purpose(s) we use your Personal Information for and the legal basis for processing your data.

## PERSONAL INFORMATION COLLECTED

### INTRODUCTION

1. Your first name and last name.
2. Contact details including email, telephone and home address.

### SKILLS AND EXPERIENCE

1. Education and previous employment details.

### REFERENCES

1. Names and contact details of two referees.

## WHAT WE DO WITH YOUR DATA

### INTRODUCTION

1. For the purpose of contacting you regarding your application.

## SKILLS AND EXPERIENCE

1. For the purpose of evaluating your application only.

## REFERENCES

1. For the purpose of evaluating your application only.

## LEGAL BASIS

### INTRODUCTION

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your information for the purposes outlined and that your fundamental rights are not harmed in doing so.

## SKILLS AND EXPERIENCE

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your information for the purposes outlined and that your fundamental rights are not harmed in doing so.

## REFERENCES

1. Legitimate Interest: We believe based on our assessment that it is in our legitimate interests to request this information for the purposes outlined and that your fundamental rights are not harmed in doing so.

## SHARING PERSONAL INFORMATION

Depending on the context, we may share your Personal Information with the following organisations only:

1. Stripe Payments UK LTD, a company incorporated under the Companies Acts in England (Company Number: 08480771) with its Registered Office address at 9<sup>th</sup> Floor, 107 Cheapside, London, EC2V 6DN to process. Stripe is a payment processor for the purposes of online transactions.
2. Mailchimp a trading name of Rocket Science Group LLP, a company incorporated in Atlanta USA with its registered address at 1526 Dekalb Ave NE, Atlanta, GA 30307, USA. Mailchimp is used by us to send you AEF information if you become a member, donor or submit an email address.
3. Appropriate contractual agreements are in place to ensure all personal information is stored and processed securely.

## TRANSFER OR PERSONAL INFORMATION OUTSIDE OF THE EEA

Information will only be shared outside of the EEA to the extent that service providers such as Mailchimp are headquartered outside of the EEA.

## RETENTION PERIODS

We will not hold your Personal Information for any longer than is necessary for the “uses” outlined above, unless we are required to keep your personal data to comply with the law and any regulatory requirements.

Should your membership lapse and you do not give us further consent to contact you, we will not contact you after one month except to remind you that your membership has lapsed, and we will delete all your data six months after the expiry date.

If you give us consent to hold your data for a specific purpose (such as a paid or voluntary position) and you do not carry that activity out for a period of six months, then we shall delete all your data at the six month anniversary of your last interaction with us.

## YOUR RIGHTS

Under the Data Protection Legislation you have certain rights in relation to your Personal Data:

1. You have the right to access the personal information that we hold about you by making a subject access request in accordance with the Data Protection Legislation. Until 25 May 2018, we may charge a fee of £10 for any requests. After 25 May 2018, we may charge a reasonable fee when a request is manifestly unfounded or excessive. You can make your request to: [info@aef.org.uk](mailto:info@aef.org.uk).
2. You have the right to have your Personal Data rectified if it is inaccurate or incomplete. You can exercise your request by contacting: [info@aef.org.uk](mailto:info@aef.org.uk).
3. You have the right to have your Personal Information deleted in certain specific circumstances.
4. You have the right to restrict the processing of your Personal Information in certain specific circumstances.
5. You have the right to withdraw your consent at any time.

To use your rights, please contact [info@aef.org.uk](mailto:info@aef.org.uk).

## PEOPLE WHO WILL ACCESS YOUR DATA

The individuals who access your data shall be officers of the AEF. They shall not use or store your data for any purpose which is not outlined above.



## DISCLOSURES

When you provide us with personal information, you are sharing the information with us only unless stated otherwise. We will not share your information with any other third parties, outside of those specified in this policy, unless you opt-in and authorise us to do so.

## OTHER WEBSITES

Our website may contain links to other websites which are outside of our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

## CHILDREN'S PRIVACY

No information should be given on this website by children under the age of 16. No sharing of data collected from with any third parties is permitted at any time under any circumstances and all applicable laws with respect to data collection from children are followed.