

# Privacy Notice

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## 1. IMPORTANT INFORMATION AND WHO WE ARE

Cambridge Aero Club respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data whilst you use our facilities and tells you about your privacy rights and how the law protects you.

Cambridge Aero Club is the “data controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information. We are required by law to notify you of the information contained in this Privacy Notice.

This Privacy Notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR). In the context of this document we will either refer to you as, ‘you’ or the ‘data subject’.

We have appointed a data privacy manager. If you have any questions about this privacy notice or our data protection practices please contact the data privacy manager.

### CONTACT DETAILS

Our full details are:

Cambridge Aero Club  
Data Privacy Manager

**Email Address:** [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com)

**Address:** Airport House, Newmarket Rd, Cambridge, CB5 8RX

**Telephone number:** 01223 373206

## 2. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data (including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender).
- Contact Data (including billing address, delivery address, email address, email address and telephone numbers).
- Financial Data (includes bank account and payment card details).
- Transaction Data (includes details about payments to and from you and other details of products and services you have purchased from us).
- Technical Data (includes internet protocol (Ip) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating systems and platform, and other technology on the devices you use to access this website).
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data to enable us to monitor how successful our marketing is. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data for the purpose for which we collected it which includes the following:

- To register you as a new customer.
- To process and deliver your order.
- To manage your relationship with us.
- To enable you to participate in a prize draw, competition or complete a survey.
- To improve our website, products/services, marketing or customer relationships.
- To recommend products or services which may be of interest to you.

#### 4. IF YOU GIVE US SOMEONE ELSE'S PERSONAL DATA

Sometimes you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

#### 5. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

#### 6. CONSENT

In order to process your data in the first instance it is necessary for us to obtain your consent. Before we can carry out your enquiry we will ask you to complete a membership form.

You can withdraw your consent at any time by contacting [Reception@CambridgeAeroclub.com](mailto:Reception@CambridgeAeroclub.com) and subject to there being no legal requirement for us to hold your data we will remove your data from our systems.

Cambridge Aero Club is the data controller. This means that we are responsible for deciding how we hold and use personal information.

If there is an overarching requirement for us to continue to hold that data we will inform you of what it is and what the legal basis is for us to continue to hold it. For example, we are required to retain flight training records for 6 Years from the date of last flight, and retain accounting transaction data for 6 years + current for HMRC. Refer to item 9.

#### 7. DISCLOSURE OF YOUR PERSONAL DATA

In most cases we do not disclose your data to any third party. However, if you are undertaking an overseas flight we will provide the HMG Border Force/NCU with your passport detail, as would be standard practice under UK law.

#### 8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or

accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### Retention Policy Statement

Cambridge Aero Club shall retain flight training records for 6 years from date of last flight, under the CAA guidance ORA.ATO.120 and AMC 1 ORA.GEN.220(b) unless there are overarching lawful circumstances.

Cambridge Aero Club shall retain financial and transactional data in line with HMRC policy <https://www.gov.uk/government/publications/hmrc-records-management-and-retention-and-disposal-policy/records-management-and-retention-and-disposal-policy>

We will retain your email address on our mailing lists until you tell us that you no longer wish to hear from us. Refer to Appendix A; Purposes for which we will use your Personal Data.

## 10. INTERNATIONAL TRANSFERS

Your data will not be transferred by us to any other country, except where there is a legal requirement applicable to HMG Border Force controls.

## 11. YOUR LEGAL RIGHTS

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.  
(Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.)
- in the event that Cambridge Aero Club refuses your request under rights of access, we will provide you with a reason as to why.  
You have the right to complain as outlined in clause 12 below.

## 12. COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Cambridge AeroClub (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to

lodge a complaint directly with Marshall ADG's Data Privacy Manager, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

Please see contact details below

	<b>Data Privacy Manager</b>	<b>Supervisory Authority</b>
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	<a href="mailto:DataPrivacyManager@MarshallADG.com">DataPrivacyManager@MarshallADG.com</a>	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>
Telephone:	01223 373206	03031231113
Website		<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

NB The recommended method of communication to the ICO is via their website

## APPENDIX A

### DETAILED PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	(e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## APPENDIX B

### GLOSSARY

#### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Consent** means that you have given your permission for us to process your data for one or more specific purposes.

**Public interest** means it is necessary to retain or process the data in the public interests of an official authority

**Vital interest** means the data is being processed or retained to protect the vital interests (i.e in the event of injury, or risk to human life) of either the data subject or of another person.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.