

PRIVACY POLICY

CONTENTS

- Introduction
- Data Controller
- GDPR Data Protection Framework
- Privacy Principles
- What personal data we collect
- How we use your data
- Our Cookies Policy
- How long we keep your data?
- The Legal Basis for using your data
- How we ensure your privacy is maintained
- Your Legal Rights relating to your personal data
- Contact Details

INTRODUCTION

At Cornwall Flying Club Ltd we are committed to ensuring that your personal information is protected and never misused.

This Privacy Policy explains what personal information we collect, why we collect it, how we use it, the control you have over your personal information and the procedures we have in place to protect it.

We take full responsibility for the security of the personal information we collect about you, we aim to be transparent about how we handle it and we aim to give you complete control over the retention or deletion of your personal information.

In this Privacy Policy when we refer to “Bodmin Airfield,” “us”, “we”, “our”, we mean the company Cornwall Flying Club Ltd, Bodmin Airfield, Cardinham, Bodmin, Cornwall, PL30 4BU.

DATA CONTROLLER

Doc Title: CFC Privacy & Cookies Policy	Page 1
Doc Reference: CFCDP100.1	Version Number: 1.1

The Data Controller in respect of personal data supplied to us is Cornwall Flying Club Ltd (company registration number: 01358549).

DATA PROTECTION FRAMEWORK

Cornwall Flying Club Ltd is based within the United Kingdom, and as such is registered with the Information Commissioner's Office (ICO) as a Data Controller under the UK Data Protection Act of 1998. We have also aligned our Privacy Policy with the EU General Data Protection Regulation (GDPR), which comes into effect on 25th May 2018, under the supervision of the Information Commissioner's Office within the UK. For more information visit the ICO site <https://ico.org.uk>.

Cornwall Flying Club Ltd has completed applicable Privacy Impact Assessments (also known as Data Protection Impact Assessments under GDPR) for all areas of our business and activities related to our business that involve the control and processing of personal information.

PRIVACY PRINCIPLES

Privacy Policies can be complicated. We have tried to make ours as clear as possible. To help, this is a brief summary of our privacy principles.

At Cornwall Flying Club Ltd we:

1. Will only ask for or collect the personal information we need to provide and improve the service, products and experiences our customers expect.
2. Give you control over the personal information we hold about you to ensure it is accurate and reflects your preferences.
3. Make sure your personal information is always secure and protected.
4. Are fair and transparent about how we use the personal information we hold.
5. Only ever use your personal information for the purposes that you trusted us to use it for.
6. Will never sell or give away your personal information.
7. Respect your choices and will inform you if there are important changes that affect your personal information or how we use it.
8. Take responsibility for the personal information that we hold about you.
9. Where data is given by "Consent" we will make sure this is an active opt-in for a specific and unambiguous purpose. That is, an act of silence, pre-ticked boxes or inactivity do not qualify as an opt-in.

Doc Title: CFC Privacy & Cookies Policy	Page 2
Doc Reference: CFCDP100.1	Version Number: 1.1

These principles demonstrate our commitment to protecting your privacy and handling your personal information in the right way and as you would expect it to be handled.

If you have any questions, comments or concerns about any aspect of this Policy or how we handle your personal information at Bodmin Airfield, please email our Privacy Team at admin@cornwallflyingclub.com

This Policy applies whether you purchase goods or services from us from the bodminairfield.com website, via telephone, email or fax, from a visit to our factory site or purchase from the Cornwall Flying Club Ltd stand at one of the many Dive Shows we attend nationally and internationally.

WHAT PERSONAL DATA DO WE COLLECT?

Cornwall Flying Club Ltd may collect the following information about you:

- When you place an order for goods or services on our website, by telephone/fax or in person at our factory sales office or at the Cornwall Flying Club Ltd stand at any exhibition: we may collect all or some of the following: your name, email address, billing address, shipping address, company name (if applicable) and VAT number (if applicable) and payment card details (see below)*. If you do not provide this information, you may not be able to purchase goods or services from us or enter into a contract with us.
- your communication and marketing preferences;
- your on-line browsing activities on the Cornwall Flying Club Ltd website;
- your interests, preferences, feedback and survey responses;
- your correspondence and communications with Cornwall Flying Club Ltd; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed, or public Facebook page).

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set up an on-line account on our website, complete an online order form or send an email to our sales team. Other personal data is collected indirectly, for example your browsing or shopping activity. We may also collect personal data from third parties but only if they can prove your consent to pass your details to us.

Doc Title: CFC Privacy & Cookies Policy	Page 3
Doc Reference: CFCDP100.1	Version Number: 1.1

See the section below “Legal Basis for Using Your Data” for more information.

PERSONAL DATA WE DO NOT COLLECT

Sensitive Personal Information

We do not knowingly or intentionally collect what is commonly referred to as ‘sensitive personal information’ such as religion, health status, ethnic origin, political views, union membership, your biometric information, sexual orientation etc. Please do not submit sensitive personal information about yourself to Cornwall Flying Club Ltd. For more information about what constitutes sensitive personal information, please see <https://ico.org.uk/> and navigate to the Special Category Data section.

Children’s Personal Data

The Cornwall Flying Club Ltd website or Cornwall Flying Club Ltd sales offices or exhibition stands, and any goods or services available from Cornwall Flying Club Ltd, are not directed to children under the age of 13. If you learn that a child under the age of 13 has provided us with their personal information without having parental consent, please contact the Company’s Data Protection Team (admin@cornwallflyingclub.com) immediately so that we can take appropriate action.

HOW WE USE YOUR DATA

General

Cornwall Flying Club Ltd uses your personal data:

- to provide goods and services to you;
- to make a tailored website available to you;
- to manage any registered account(s) that you hold with us;
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- to maintain a voluntary register of club members and aircraft owners to verify owner qualifications, status, as part of our commitment to safety as a responsible flying club and airfield manager;

Doc Title: CFC Privacy & Cookies Policy	Page 4
Doc Reference: CFCDP100.1	Version Number: 1.1

- to inform you of any safety notices;
- to contact you electronically with important updates, such as airfield information, CAA notifications;
- with your agreement: to contact you electronically about promotional offers and products and services which we think may interest you;
- for market research purposes - to better understand your needs;
- to enable Cornwall Flying Club Ltd to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

Promotional Communications

Cornwall Flying Club Ltd aims to inform existing customers about products & services, which are of interest and relevance to you as an individual. We will also send such emails to individuals who may not yet be Cornwall Flying Club Ltd members/customers but who have opted to receive our newsletters by requesting this on the bodminairfield.com website or in person for example, requesting to join this mailing list at an exhibition.

You have the right to opt out of receiving promotional communications at any time, by:

1. contacting our Privacy Team at admin@cornwallflyingclub.com

Web Banner Advertising

If you visit our website, you may receive personalised banner advertisements whilst browsing other websites. Any banner advertisements you see will relate to products you have viewed whilst browsing our websites on your computer or other devices.

These advertisements are provided by Cornwall Flying Club Ltd via market leading specialist providers using 'cookies' placed on your computer or other devices (see further information on the use of cookies in our Cookie Policy). You can remove or disable cookies at any time - see below for further information.

Doc Title: CFC Privacy & Cookies Policy	Page 5
Doc Reference: CFCDP100.1	Version Number: 1.1

Sharing Data With Third Parties

Our service providers and suppliers

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include IT, delivery and marketing service providers.

Cornwall Flying Club Ltd only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to Cornwall Flying Club Ltd and to you, and for no other purposes.

Other Third Parties

Aside from our service providers, Cornwall Flying Club Ltd will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data with:

- credit reference agencies where necessary for card payments;
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
- to comply with our legal obligations;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and customers.

COOKIE POLICY

Our websites use cookies to collect information. This includes information about pages viewed, products purchased and the customer journey around our websites. Detailed information is set out in this Cookie Policy.

What are cookies?

Like most websites, the Cornwall Flying Club Ltd website, www.bodminairfield.com, use cookies to collect information. Cookies are small data files which are placed on your computer or other devices (such as smart ‘phones or ‘tablets’) as you browse the website. They are used to ‘remember’ when your computer or device accesses our website. Cookies are essential for the effective operation of our website and to help you shop with us online. They are also used to tailor the products and services offered and advertised to you, both on our website and elsewhere.

Information collected

Some cookies collect information about browsing and purchasing behaviour when you access this website via the same computer or device. This includes information about pages viewed, products purchased and your journey around a website. We do not use cookies to collect or record information on your name, address or other contact details. Cornwall Flying Club Ltd can use cookies to monitor your browsing and purchasing behaviour.

How are cookies managed?

The cookies stored on your computer or other device when you access our websites are designed by:

- Cornwall Flying Club Ltd, or on behalf of Cornwall Flying Club Ltd, and are necessary to enable you to a make purchases on our website;
- third parties who participate with us in marketing programmes; and
- third parties who broadcast web banner advertisements on behalf of Cornwall Flying Club Ltd.

What are cookies used for?

The main purposes for which cookies are used are:

1. For technical purposes essential to effective operation of our websites, particularly in relation to online transactions and site navigation.

Doc Title: CFC Privacy & Cookies Policy	Page 7
Doc Reference: CFCDP100.1	Version Number: 1.1

2. For Cornwall Flying Club Ltd to market to you, particularly web banner advertisements and targeted updates.
3. To enable Cornwall Flying Club Ltd to collect information about your browsing and shopping patterns, including to monitor the success of campaigns, competitions etc.
4. To enable Cornwall Flying Club Ltd meet its contractual obligations to make payments to third parties when a product is purchased by someone who has visited our website from a site operated by those parties.

How do I disable cookies?

If you want to disable cookies you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

For Microsoft Internet Explorer:

1. Choose the menu “tools” then “Internet Options”
2. Click on the “privacy” tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced
2. Under "Privacy and security," click “Content settings”.
3. Click “Cookies”

For Safari:

1. Choose Preferences > Privacy
2. Click on “Remove all Website Data”

For Mozilla firefox:

1. Choose the menu “tools” then “Options”
2. Click on the icon “privacy”
3. Find the menu “cookie” and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files”> “Preferences”
2. Privacy

What happens if I disable cookies?

This depends on which cookies you disable, but in general the website may not operate properly if cookies are switched off. If you only disable third party cookies,

Doc Title: CFC Privacy & Cookies Policy	Page 8
Doc Reference: CFCDP100.1	Version Number: 1.1

you will not be prevented from making purchases on our site. If you disable all cookies, you will be unable to complete a purchase on our site.

HOW LONG DO WE KEEP YOUR DATA?

We will retain your data for no longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data.

Contractual Data

Personal data collected for the purpose of completing a contract in the sale of Cornwall Flying Club Ltd goods and services will be retained for 6 years, which is the time we are obliged by HMRC to keep a record of all financial transactions.

<https://www.gov.uk/running-a-limited-company/company-and-accounting-records>

Newsletter Sign-up Data

Newsletter “sign up” on the website continues until the receiver unsubscribes by emailing admin@cornwallflyingclub.com

LEGAL BASIS FOR USING YOUR DATA

We are required to set out the legal basis for our ‘processing’ of personal data.

General

Cornwall Flying Club Ltd collects and uses customers’ personal data because is it necessary for:

- the pursuit of our “Legitimate Interests” (as set out below);
- the purposes of complying with our duties and exercising our rights under a “Contract” for the sale of goods or services to a customer (as set out below); or
- complying with our “Legal Obligations”.
- “Consent” for direct marketing communications to prospective customers - but only when we have a clear record of the nature of this consent, when

Doc Title: CFC Privacy & Cookies Policy	Page 9
Doc Reference: CFCDP100.1	Version Number: 1.1

this consent was given and if it falls within the time frame of how long we state we will retain such data in this Policy.

- “Vital interests”. That is, “life or death” situations to protect the vital interests of the data subject, or another natural person.
- “Public interest”. That is, if it relates to tasks executed in the public interest, by official authority of the data controller.
- “Member state specific purposes”, including national law and public interest requirements.

In general, we only rely on “Consent” as a legal basis for processing in relation to sending direct marketing communications to prospective customers via email or text message.

Customers **have the right to withdraw consent at any time**. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

Our Contractual Interests

The normal legal basis for processing customer data, is that it is necessary for the contractual interests of Cornwall Flying Club Ltd, including:

- Contracting to sell and supply goods and services to our customers;

[Legal basis for processing: “Contractual necessity” – the data is necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form online or for our sales team/ERP systems, to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you order confirmations, goods and receipts.

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form or our sales team/ERP systems, for this purpose. We also have a legal obligation to keep accounting records, including records of transactions.

Our Legitimate Interests

The normal legal basis for processing customer data, is that it is necessary for the “Legitimate Interests” of Cornwall Flying Club Ltd, including:

- Protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- Promoting, marketing and advertising our products and services to existing customers;
- Sending promotional communications which are relevant and tailored to individual existing customers;
- Understanding our customers’ behaviour, activities, preferences, and needs;
- Improving existing products and services and developing new products and services;
- Complying with our legal and regulatory obligations;
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- Handling customer contacts, queries, complaints or disputes;
- Managing insurance claims by customers;
- Protecting Cornwall Flying Club Ltd, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Cornwall Flying Club Ltd;
- Effectively handling any legal claims or regulatory enforcement actions taken against Cornwall Flying Club Ltd; and
- Fulfilling our duties to our customers, colleagues and other stakeholders.

HOW WE PROTECT YOUR DATA

Our Controls

How we secure your information

Cornwall Flying Club Ltd is committed to keeping your personal data safe and secure.

Our security measures include:

Doc Title: CFC Privacy & Cookies Policy	Page 11
Doc Reference: CFCDP100.1	Version Number: 1.1

- encryption of data;
- regular cyber security assessments of all service providers who may handle your personal data;
- regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;
- regular penetration testing of systems;
- security controls which protect the entire Cornwall Flying Club Ltd IT infrastructure from external attack and unauthorised access; and
- internal policies setting out our data security approach and training for employees.

SSL Encryption of Payment Card Details

When purchasing goods online from Bodmin Airfield your card details are SSL encrypted and go directly to Paypal), our third party card payment processing company. The card details are not visible to (or obtainable by) any employee of Cornwall Flying Club Ltd.

Payment Card Details

When you make a purchase or place an order with us via telephone, in person at Cornwall Flying Club Ltd or at an exhibition your payment card details are collected but only for the period of the transaction. No payment card records are retained. No physical copy is retained and any that are made temporarily during the transaction are destroyed by shredding.

We are committed to an ongoing employee-training programme and to fostering a *culture of privacy & data security* among all Cornwall Flying Club Ltd staff involved in the processing and protection of personal data. We are committed to the GDPR principles of 'Privacy by Design & Default' in that we take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you

Doc Title: CFC Privacy & Cookies Policy	Page 12
Doc Reference: CFCDP100.1	Version Number: 1.1

submit to us via any forms on our website and any payment transactions you make on or via our website;

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet by email, you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Cornwall Flying Club Ltd uses a third party email security provider to store and filter emails you send us. Our third party email provider is Support Solutions IT.

Where we store your personal information

Customer order data is stored electronically within a secure ERP system on a secure and protected server. Paper copies of goods and services transactions are kept in secure storage.

Cornwall Flying Club Ltd uses a third party IT company to protect and secure our company intranet. Our third party IT provider is NCi Technologies. This is a comprehensive package of managed security services including: Anti-virus, Firewall, a Backup & Disaster Recovery (BDR) system. More information is available here: https://www.ncitech.co.uk/Business_IT_Services/IT_Security

Consensual newsletter requests are retained by the Website and Newsletter administrators.

By registering on the website or sending us your personal information by other means, you are indicating your consent for your personal information to be stored in accordance with the above.

WHAT YOU CAN DO TO HELP PROTECT YOUR DATA

Cornwall Flying Club Ltd will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from Cornwall Flying Club Ltd or Bodmin Airfield asking you to do so, please ignore it and do not respond.

Doc Title: CFC Privacy & Cookies Policy	Page 13
Doc Reference: CFCDP100.1	Version Number: 1.1

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety both in relation to Cornwall Flying Club Ltd and more generally:

- keep your account passwords private.
- when creating a password, use at least 8 characters with a combination of letters and numbers. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your password. You can do this by logging into your account > clicking 'Account Information' > checking the 'Change Password' tick box.
- avoid using the same password for multiple online accounts.

YOUR RIGHTS

You have the following rights:

- the right to ask what personal data that we hold about you at any time and for this to be completed in a timely manner within 30 days maximum;
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
- (as set out above) the right to opt out of any marketing communications that we may send you.
- you have the right to lodge a complaint with the Information Commissioner's Office.

If you wish to exercise any of the above rights, please email Cornwall Flying Club Ltd using admin@cornwallflyingclub.com or any of the contact methods set out below.

CONTACT INFORMATION

If you have any questions about how Cornwall Flying Club Ltd uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- Phone us on: 0044 (0)1208 821 419;
- Email us at: admin@cornwallflyingclub.com or

Doc Title: CFC Privacy & Cookies Policy	Page 14
Doc Reference: CFCDP100.1	Version Number: 1.1

- Write to us at: The Privacy Team, Cornwall Flying Club Ltd Ltd, Bodmin Airfield, Cardinham, Bodmin, Cornwall, PL30 4BU

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>.

UPDATES

This policy was last updated in May 2018.

END OF PUBLIC POLICY DOCUMENT

RESPONSIBILITIES

- ❖ Senior Management shall be responsible for:
 - ensuring that Cornwall Flying Club Ltd remains fully compliant with GDPR
 - providing the personnel, resources, infrastructure and training required
 - ensuring that mandatory data protection training is delivered on a regular basis
- ❖ Senior Management shall:
 - maintain professional awareness of GDPR and its requirements
 - advise the board of any changes to data protection legislation
 - act as a reference point to the organisation's management and staff
 - maintain communications with the Supervisory Authority
 - co-ordinate breach reporting activities, and any follow-up investigative actions
- ❖ All employees, club members assisting, contractors, and third parties, as defined within the Scope of this Policy, shall:
 - understand and fully comply with this Data Protection Policy
 - maintain an understanding of GDPR, and their role in ensuring full compliance
 - promptly identify and report and data losses or breaches of which they become aware

Doc Title: CFC Privacy & Cookies Policy	Page 15
Doc Reference: CFCDP100.1	Version Number: 1.1

- attend data protection training which has been provided by Cornwall Flying Club Ltd

Document Control

This Policy needs to be formally reviewed on an annual basis, or if required changes are identified to address one or more of the following:

- ❖ A change in business activities, which will or could possibly affect the organisation's ability to fully comply with GDPR and other related data protection requirements
- ❖ A change in the way in which the Company manages personal data, or any of the activities which process personal data
- ❖ A change in data protection regulations or associated legislative requirements
- ❖ An identified shortcoming in the effectiveness of this Policy, for example as a result of a data breach, Supervisory Authority investigation, formal review or an audit finding

The current version of this Policy, together with its previous versions, shall be recorded below.

Version	Description	
1.0	Date Live:	<i>24th May 2018</i>
	Version Notes:	<i>Initial Version</i>
	Reviewed by:	<i>Martin Parker</i>
	Approved by:	<i>CFC Board meeting 23.05.2018</i>
1.1	Date Live:	7 th June 2018
	Version Notes:	Responsibilities modified
	Reviewed by:	Martin Parker
	Approved by:	Corinne Dennis (CFC Board Member) & Darren Fern (Chairman)
	Date Live:	
	Version Notes:	
	Reviewed by:	
	Approved by:	