



## **Privacy Policy**

### **Introduction**

Your privacy is important to us. We promise to treat all of your personal data responsibly. This Privacy Policy details our position with respect to processing and holding your personal data as outlined by the European GDPR.

This Privacy Policy applies to our website, including your membership account that you will hold if your application to join BAVirtual is successful. It also applies to our private members forum and the BAVirtual Training website. We do not share any of your details with a third party unless we are required to do so in law.

Please take the time to read this Privacy Policy carefully and if you have any questions then please get in touch. Details of how to get in touch are given at the end of this policy document.

### **Who we are?**

We are BAVirtual, a website based virtual airline using Flight Simulation platforms to emulate the operations of a UK based airline. We have up to 1250 members at any one time and are staffed entirely by volunteers. Our primary means of communication with members is via the website ([www.bavirtual.co.uk](http://www.bavirtual.co.uk)) and the private members forum.

Membership to BAVirtual is free of charge at the point of delivery to members.

### **What information do we collect?**

Personal data collected about you is taken from the web-based application form you fill in when applying to join BAVirtual. We only hold data that you give or have given to us. The data collected is as follows:

1. The date of your application.
2. Your full name as provided by you.
3. Your date of birth and therefore your age determined from that date of birth.
4. Your email address.
5. Your network ID (VATSIM and/or IVAO).
6. Your country and city of residence.
7. Your IP address from the location where the application is submitted.

No data is collected from third parties. All personal data is held encrypted in our database on our secure server.

## **How do we use personal information?**

The personal data we collect is used to identify people making applications to join BAVirtual. These applications are processed to determine if they fulfil the membership requirements laid down in the BAVirtual SOP Document which is available on the website. The same data from successful applicants is used to create and administer personal pilot accounts with BAVirtual.

This account allows a member to log virtual flights with BAVirtual building up a log book with routes, airframes and flight hours to allow promotion through the ranks within the VA.

The name that you provide to us is also used to set up a private members only forum account to allow members access to the members forum.

The same details are also used to set up a training account to allow members to receive structured training programmes to help them to develop their flight simulation skills.

Personal email addresses are used to communicate with members regarding applications, flights or membership issues that may arise from time to time during their membership: examples of this include opt-in PIREPs (flight reports) for each flight flown, or contacting members of staff with membership issues such as problems maintaining an active account, or to get in touch directly with a staff member for advice or training.

We do not mass-email members. Any membership wide announcements are made via the pilot's on-line Briefing Room, the forum and our ACARS system.

Personal details are also used to fulfil our legal obligations in terms of preventing fraudulent activity.

We **DO NOT** share any of your personal information with third parties unless required to do so in law.

## **What legal basis do we have for processing your personal data?**

BAVirtual's lawful basis for processing and retaining personal data lies within "Legitimate Interests".

Legitimate interests (Article 6(1)(f)) : data processing is necessary for the purposes of the legitimate interests pursued by BAVirtual for the purposes of safeguarding BAVirtual from fraudulent applications including under-age applications, applications from people using false details, and ex-members who have received a ban from re-joining now and in the future. This is only achievable by data comparisons between current and historical applications and accounts.

The exception to this is where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. BAVirtual does not allow members under the age of 16 years.

When a person applies to join BAVirtual they agree to the retention of personal data for the above reasons, by way of the fact they freely applied to join BAVirtual, and by way of agreeing to this legal basis for processing personal data via an opt-in check box.

We only use your personal data how you would reasonably expect it to be used when joining a Virtual Airline. This is to fundamentally allow you to log flights and build a log book, as well as safeguarding the VA against fraudulent activity as stated above.

Not agreeing to this lawful basis of personal data processing will result in the termination of the application process so as to preserve the individual's interests, rights and freedoms.

### **When do we share personal data?**

We will never share your personal data with third parties except where required by law.

### **Where do we store and process personal data?**

All personal data is collected via the application form on our secure web site. Our server is currently located in the European Union, specifically in Germany.

The data is processed by staff based in the UK and stored on our secure server in Germany. All flight logging via our ACARS system and use of the private members forum is via the server located in Germany.

### **How do we secure personal data?**

Personal Data is stored on our secure server. Access to the data is by encrypted passwords held by a limited number of BAVirtual staff members who hold appropriate positions that require the viewing and processing of personal data. This primarily includes the Human Resources Department who manage the application process and members accounts, but other members of the Board of Directors and Technical Teams also have access to personal data for managing member's issues that arise from time to time. This includes inter-member disputes and technical issues with member's accounts preventing them from accessing the features of the VA.

All data is periodically backed up to a secure storage facility to prevent against loss. This is off-site from the main server to safeguard against data loss from disaster and to ensure continuity of service in the event of hardware failure.

All managers who can access member's personal data use encrypted passwords. These passwords are changed periodically to maintain security in the event that a manager leaves their role. All individuals who come into a management role requiring access to member's details are trained in data processing and security.

### **How long do we keep your personal data for?**

All personal data is kept until we no longer require it. This is to allow us to maintain our lawful basis of Legitimate Interests towards the safeguarding of BAVirtual as outlined above. The "right to be forgotten" will be applicable once our lawful basis of legitimate interests for processing and storing personal data ceases. This would be in the case of BAVirtual closing down and ceasing to operate.

### **Your rights in relation to personal data**

Your rights under GDPR:

1. You can request to see the personal information we hold about you at any time – a subject access request (SAR). This will be provided to you via email within the maximum time period of one month as determined by GDPR. We cannot and do not charge a fee for doing this.
2. You can request that we make any alterations or corrections to your data as required. We may request to see evidence to prove that the change is a legitimate change, for example, a change to your name.

3. Deletion of data or the “right to be forgotten” will be applicable in the event of BAVirtual ceasing to operate at any point in the future. Our lawful basis of legitimate interests for processing personal data is outlined earlier in this Privacy Policy.
4. The right to Data portability is not relevant to members as we do not operate any cross platform services requiring the porting of data.
5. The restriction of processing is applicable if you feel that there is some inaccuracy in the personal data we hold for you and we are verifying the data, usually by you providing to us a form of ID. This ID will be securely destroyed once we have verified the relevant details. Once the details have been verified, the restriction will be automatically lifted.
6. Your right to object to direct marketing: We do not email members with respect to any marketing or mass-emailing. All email communication is on a one to one basis with respect to applications, membership issues or opt-in PIREPs.

To exercise your rights under GDPR, please email [membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk) with your request so we can assist you. We will respond to your requests within the time periods laid down by GDPR.

### **Use of automated decision-making.**

Applications from members will be automatically rejected if the data provided by you is inaccurate. The most common cause for this is the incorrect use of the UK date format of dd/mm/yyyy on the application form resulting in an “auto-rejection”. Please take the time to enter data carefully into the application form to minimise the risk of this occurring.

All decisions regarding membership are done manually by members of the Human Resources Team. Any queries over decisions should be directed to that department via email to [membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk)

### **Use of cookies on the BAVirtual Website**

When you visit our website we issue a cookie or unique code that allows us to identify your computer. A cookie is used to note the different areas of the services recently accessed through your computer - this can only be done in relation to this website service and not in relation to any other sites you visit. Information collected in this way is used to ensure that our website is both interesting and relevant and to develop and manage our online services. Cookies in themselves do not identify the individual user, just the computer used.

### **How to contact us?**

If you have any questions or require clarification regarding the BAVirtual Privacy Policy, please send an email to [membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk). Please bear in mind that we are a voluntary organisation so the email address is not monitored 24/7. We will reply to your query in a timely manner.